



SCOPING OF POTENTIAL DEVELOPMENT SITES: PWLLHELI

DEVELOPMENT APPRAISAL REPORT

CPF: 4444

CLIENT: Anglesey and Gwynedd Joint Planning Policy Unit

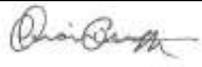
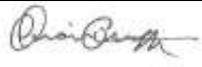
Document Control Sheet

Document Title:	Development Appraisal Report
Document Author:	C. Jones
Project Manager:	O. Griffith
Project Title:	Scoping of Potential Development Sites: Pwllheli

Revision History

Date	Version No.	Summary of Changes
25/11/2013	0.01	First Draft Issue for Client Comment
21/11/2014	0.02	Additional information provided regarding utilities infrastructure

Approvals

Approved by	Signature	Date	Version
O. E. Griffith		25/11/13	0.01
O. E. Griffith		24/11/14	0.02

Distribution

Name	Title	Date	Version
Nia Haf Davies	Rheolwr Cynllunio (polisi)	24/11/14	0.02

© 2013-14 Gwynedd Council / YGC. All Rights Reserved.

Copyright in any or all of this documentation belongs to Gwynedd Council / YGC of Council Offices, Shirehall Street, Caernarfon, Gwynedd, LL55 1SH (the 'Owner') and may not be used, sold, transferred, copied or reproduced in whole or in part, in any manner of form or on any media to any person other than in accordance with the terms of the Owner's agreement or otherwise without the prior written consent of the Owner.



Executive Summary

Gwynedd Council and the Isle of Anglesey County Council are currently undertaking work on a Joint Local Development Plan (JLDP) which will set the planning policy framework for both Local Planning Authority areas until 2026. YGC have been commissioned by the Anglesey and Gwynedd Joint Planning Policy Unit (JPPU) to undertake a feasibility study to determine the suitability of three potential sites within the Pwllheli area for potential inclusion in the JLDP. This report provides a summary of the studies that have been undertaken and presents the findings.

The main aim of this report is to provide a summary of the studies that have been undertaken and present the findings about the three sites' suitability for development during the JLDP period and their potential to be extended beyond the JLDP period. The following elements have been considered:

- Transportation and movement;
- Utilities capacity;
- Landscape and visual character;
- Ecology;
- Archaeology, and;
- Arboriculture.

At this stage, the developments have not been firmly defined so there is an element of uncertainty regarding the extent of the associated impacts. However, a precautionary approach has been adopted to ensure that any potential features that could be affected have been identified where possible. Further surveys are recommended where relevant, once formal access to the sites has been obtained and development proposals defined.

The constraints and opportunities for each site, as well as indicative development principles, are included in Section 4 of the report. Constraints include access limitations along the minor roads, sensitive landscape receptors and uses and protected species. However, there are also potential opportunities as a result of proactively addressing the constraints in order to enhance any developments at each site.

List of Acronyms

AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
BS	British Standard
CIEEM	Chartered Institute of Ecology and Environmental Management
DMRB	Design Manual for Roads and Bridges
GAPS	Gwynedd Archaeological Planning Service
GIS	Geographical Information System
HRA	Habitats Regulations Assessment
JLDP	Anglesey and Gwynedd Joint Local Development Plan
JNCC	Joint Nature Conservation Committee
JPPU	Anglesey and Gwynedd Joint Planning Policy Unit
LANDMAP	Landscape Assessment and Decision-Making Process
LBAP	Local Biodiversity Action Plan
LCA	Landscape Character Area
LNR	Local Nature Reserve
LOHI	Landscape of Outstanding Historical Interest
LPA	Local Planning Authority
LSHI	Landscape of Special Historic Interest
LWS	Local Wildlife Site
NRW	Natural Resources Wales
NERC Act	The Natural Environment and Rural Communities (NERC) Act 2006
NGR	National Grid Reference
NNR	National Nature Reserve
NVC	National Vegetation Classification
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TAN	Technical Advice Note
TPO	Tree Preservation Order
UDP	Unitary Development Plan
UKBAP	United Kingdom Biodiversity Action Plan

Contents

1.0	Introduction	6
1.1	Aims and Objectives	6
2.0	Methods	8
2.1	Limitations	8
3.0	Scoping Topics	10
3.1	Transportation and movement	10
3.2	Utilities capacity	15
3.3	Landscape and visual character	20
3.4	Ecology	47
3.5	Archaeology and Cultural Heritage	54
3.6	Arboriculture	56
4.0	Conclusions	57
Table 4.1: Constraints and Opportunities for the Development and Long Term		
	Growth Potential of Sites 1 – 3	58
	Table 4.2: Indicative Development Principles for Sites 1 – 3.	63

Appendix A: Plans and Figures

A.1: Transport Appraisal Plan

A.2: Utilities Plans

A.3: Landscape Appraisal Plans

A.4: Extended Phase 1 Habitat Survey Plans and Target Notes

Appendix B: Consultation Responses

1.0 Introduction

Gwynedd Council and the Isle of Anglesey County Council are currently undertaking work on a Joint Local Development Plan (JLDP), which will set the planning policy framework for both Local Planning Authority areas until 2026. The JLDP will replace the Gwynedd Unitary Development Plan (UDP) when adopted.

YGC have been commissioned by the Anglesey and Gwynedd Joint Planning Policy Unit (JPPU) to undertake a feasibility study to determine the suitability of three potential sites within the Pwllheli area for potential inclusion in the JLDP. The three sites are all located to the north of Pwllheli, as shown on Figure 1.

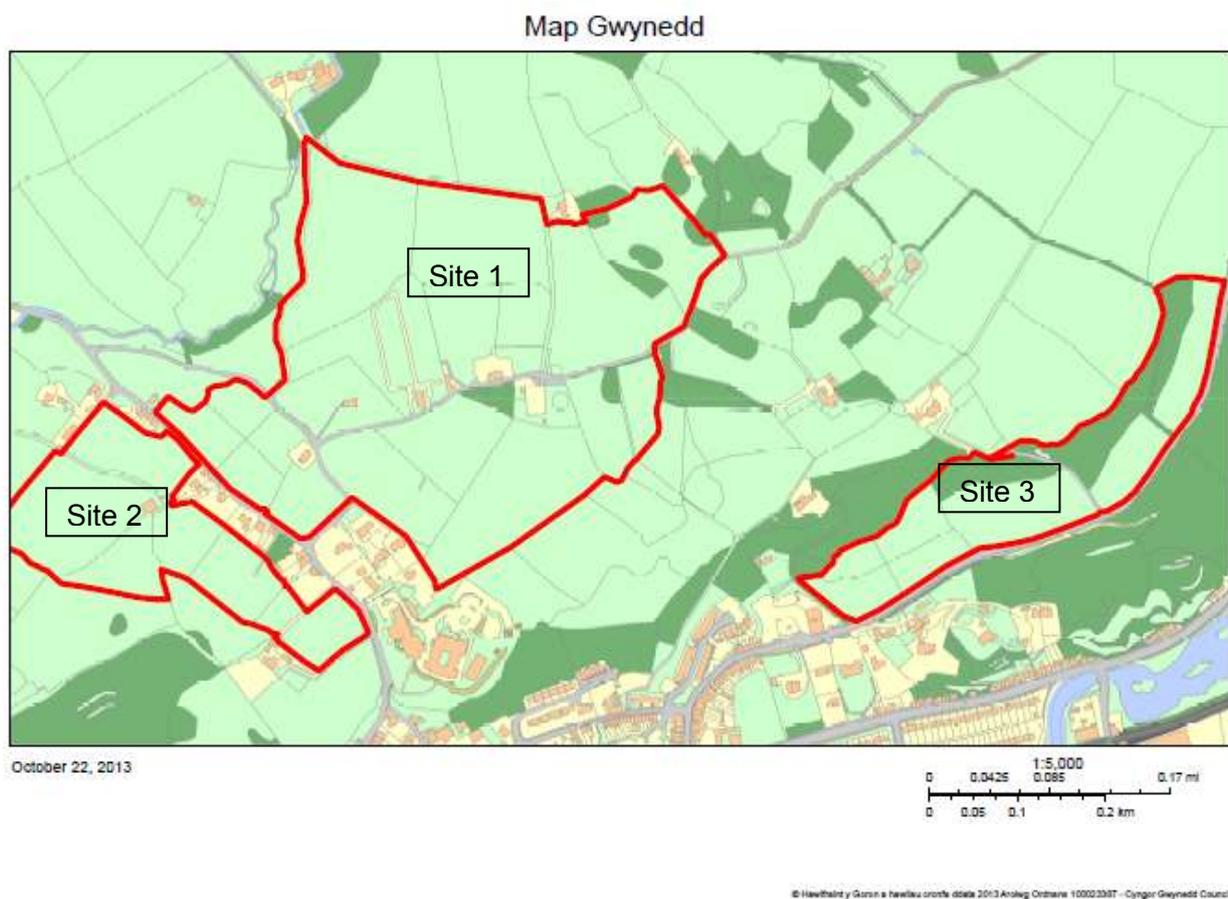


Figure 1: Location of the three study sites in Pwllheli

1.1 Aims and Objectives

In order to meet the aim of providing informed and justified policy-based allocations within the JLDP the main objective of this study is to provide a comprehensive evidence base about the three sites' suitability for development during the JLDP period and their potential to be extended beyond the JLDP period.

Current evidence suggests a requirement to accommodate new housing units in Pwllheli. The JPPU is currently considering representations made during the public consultation period about the JLDP Preferred Strategy as well as the emerging 2011 population and household projections. Therefore, the exact figure of housing units has not yet been confirmed and the proposed target may rise as the potential for long term growth must also be considered. However it has been agreed that the recent example of Penrhosgarnedd can be used to provide an indicative example of the number potentially provided at each site, as follows (note that these figures are indicative only and subject to change):

- Site 1 (North of Coleg Meirion Dwyfor): 374 houses
- Site 2 (Penrallt): 100 houses
- Site 3 (Allt Fawr): 60 houses

In addition to housing, the Employment Land Review has revealed a need for a 5ha site for employment purposes.

The following elements were required to be considered within this study:

- Transportation and movement: assess vehicular access and the impact on existing roads, and any recommendations for improvement to all forms of transportation linkages around and through the sites;
- Utilities capacity: identify the location and capacity of existing services (gas, electricity supply, telecommunications and water supply) in conjunction with service providers and determine possible reinforcement needs, connection points, and possible timescales and costs;
- Landscape and visual character: assess the overall sensitivity and capacity of the locality to establish whether or not the landscape can accommodate development-related change;
- Ecology: identify the potential biodiversity issues and impacts that could arise as a result of development;
- Archaeology: preliminary assessment of the potential for on-site archaeological remains and potential impact on these remains (if any exist) as well as off-site archaeological remains and cultural heritage resources;
- Arboricultural: assess the suitability for development in respect of potential effects on tree stock

This report aims to provide a clear audit trail of the evidence gathered during the desk study, field study and appropriate consultation. The findings of this report are based on the information provided at the time of writing and it would be good practice to review the report's findings if the project is not undertaken within 12 months and/or if the nature of the project changes considerably. In addition, as further details become known about the exact nature of the developments, further studies may be required to ensure that their potential impacts are fully identified and assessed.

2.0 Methods

The following methods were adopted to gather the necessary information for each topic:

Transportation and movement

YGC's roads unit completed the assessment for this topic using the Design Manual for Roads and Bridges road transport planning guidance. This included a site visit, identifying possible highway improvements, and providing outline designs of possible improvements and associated plans and cost estimates.

Utilities capacity

YGC's roads unit also completed this assessment, which involved consultation with the statutory services undertakers through issuing C2 notices, compiling the responses, requesting capacity checks and reviewing service locations and their capacities.

Landscape and visual character

A specialist landscape consultant was appointed for this element of the study. Their method involved:

- a site walkover to view as much of the sites as possible;
- undertaking a landscape sensitivity and capacity assessment for each site (desk and site-based) to establish their key characteristics, landscape/townscape context and receptors;
- recording findings on plans including the results of photographic surveys;
- carrying out a landscape planning guidance and policy context review;
- developing key issues and landscape mitigation principles for each site for consideration and input into a strategic land allocation master plan;
- preparing an evidence base and fully-reasoned justification on the relative ability, or otherwise, of the sites to accommodate development.
- highlighting the advantages of each site and mitigation of negative effects focusing on wider landscape effects, views from neighbouring properties, footpaths and roads/street scene.

Ecology

The potential biodiversity issues and impacts that could arise as a result of development were assessed by YGC's environment unit. The method adopted for this study included:

- gathering and identifying previous biodiversity records from each site (via Cofnod data previously obtained from the study area in 2010), and a 200m buffer around each site, in order to identify any protected and Section 42 species and habitats that are or have been present;
- using GIS to identify any sensitive sites and features such as Natura 2000 sites, SSSI's and Local Wildlife Sites within 2km;

- consultation with Natural Resources Wales to identify any significant issues regarding protected species and habitats within the study area;
- completing a Phase 1 habitat survey of each site in accordance with the JNCC Handbook for Phase 1 Habitat Surveys and the Guidelines for Ecological Assessment to identify any potential ecological constraints at each site and within a buffer area around them. The ecologist is a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).

Archaeology

YGC's environment unit completed this assessment following a desk study and consultation with relevant stakeholders as follows:

- use of GIS to identify any designated cultural heritage and archaeological features that may be present in the study area;
- consultation with Cadw and Gwynedd Archaeological Planning Service to ascertain whether any archaeological remains and cultural heritage features are likely to be present in the study area, and;
- using the information obtained to inform any further assessment and field surveys that may be required if development occurs.

Arboriculture

This assessment was completed by YGC's environment unit and entailed the following:

- using GIS and the Phase 1 field survey to confirm whether any tree stock is present at or adjacent to the sites;
- clarifying with the Gwynedd UDP/emerging JLDP whether any future allowance has been made for tree stock in or adjacent to each site, and;
- considering the potential effects of development on mature trees present in the study area in accordance with the principles of BS5837:2012 – Trees in relation to design, demolition and construction.

2.1 Limitations

Due to land access restrictions it was not possible to complete the Phase 1 ecological survey to the level of detail normally applied. Therefore, the surveyor used public rights of way and viewpoints where possible to identify evidence and features that would indicate the presence of protected species and habitats. However, not being able to access the land at each site fully means that some evidence and features may not have been identified during the survey.

At this stage, the developments have not been firmly defined so there is an element of uncertainty regarding the extent of the associated impacts. However, a precautionary approach has been

adopted to ensure that any potential features that could be affected have been identified where possible.

3.0 Scoping Topics

3.1 Transportation and movement

As explained in Section 1.1 the number of potential developments for each site was established using previous recent developments of similar size; this gave a number of properties per hectare that was multiplied with the area of land for each site to give the following:

- Site 1 = 374 properties
- Site 2 = 100 properties
- Site 3 = 60 properties

After the amount of properties was established an assessment on how the local road network could be affected was carried out. For the purposes of the assessment it was predicted that each property will generate four additional car journeys per day; this is based on previous developments of a similar size using TRICS 2011 (a).

A site visit was conducted on the 14th October to assess the current status of the existing routes in and around Sites 1 to 3.

3.1.1 Baseline

Sites 1 and 2

Due to the close proximity of Sites 1 and 2, these have been considered together.

Vehicular access (see Appendix A.1, Plan 4444/FE/01)

There are three main accesses to Sites 1 and 2. These are:

- Access from A499 north;
- Access from A497 via Gaol Street/Allt Salem, and;
- Access from Llannor area.

A499 North (see Appendix A.1, Plan 4444/FE/01)

The existing class 3 road leading from the A499 to Site 1 is approximately 1.4km long. Access onto the class 3 road has poor visibility south (towards Pwllheli). The road then rises steeply from the access and turns 90° at Yoke House. From Yoke House the forward visibility is relatively good up to the property of Bryn Crin. From Bryn Crin the geometry of the road worsens as it becomes winding; this significantly affects the forward visibility up to Site 1. At present pedestrians wishing to access the site would have walk on the road.

Access from A497 via Gaol Street and Allt Salem (see Appendix A.1, Plan 4444/FE/01)

This route is the most direct route from the Abersoch / Llanbedrog area (west Llŷn Peninsula) to Sites 1 and 2. The most commonly-used access to Sites 1 and 2 through Pwllheli is to turn north at Maes Square roundabout. From Maes Square roundabout the road follows a northerly direction through Gaol Street; a two-way road that has footway provision on both sides. There is on-street parking outside Penlan Church. The road is narrow (4.8m wide) and conflicts between pedestrians and vehicles are common.

At the northern end of Gaol Street there is a crossroad which joins Lley Street and the High Street. The road carries on passing Lley Street Uchaf on the right hand side and heads on towards Coleg Meirion Dwyfor where the geography of the road becomes steep in nature. Pedestrians wishing to access Site 1 or 2 from the High Street area would have to walk on the road from the Lley Street Uchaf junction.

Access from Llannor area (see Appendix A.1, Plan 4444/FE/01)

Vehicular access to Sites 1 and 2 from the Llannor area could be via a link to the A497 and B4354 (north-west Llŷn Peninsula).

Site 3

Access from A499 South to Site 3 (see Appendix A.1, Plan 4444/FE/01)

Site 3 is situated on the left hand side of the road from the access road to Llwyn-Ffynnon and ends 50m from the class 3 road on the right hand side. The two major accesses to the site are via the:

- A499 south, and;
- A499 north.

The easiest route to access Site 3 from Pwllheli and the western side of the Llŷn Peninsula is via Pwllheli town centre following the A497 and A499. Starting from the A497 / A499 roundabout the A499 has footway provision on both sides of the road. The footway provision on the right hand side finishes at the property Bryn Fednant. The footway on the left hand side finishes 100m south of the access to Plas Tirion.

Access from A499 North to Site 3 (see Appendix A.1, Plan 4444/FE/01)

The most convenient way to access Site 3 from a northerly direction is to use the A499. This route will accommodate all vehicles from the north.

The A499 from Llwyn Hudol drops down sharply to the start of the site. Footway provision ends at the property of Bryn Tirion. There are two junctions along the route access; the first at junction

with Yoke House and the other at Lôn Nant – Stigallt. Shortly after the junction of Lôn Nant – Stigallt is Site 3. Currently all pedestrians wishing to access the route will walk on the carriageway.

3.1.2 Suggested Improvements

Based on the findings of the transport capacity assessment summarised in Section 3.1.1, the following improvements are recommended in order to ensure that the local road infrastructure is sufficient to meet the additional demands created by new development in Sites 1 to 3. All improvements would follow the principles of the *Manual for Streets*.

Sites 1 and 2 (see Appendix A.1, Plans 4444/FE/02 – FE/03)

A499 North

- 1) Improve the Class 3 road from the A499 junction with Bryn Tirion / Yoke House to Site 1 (1.4km long); this will include improvement of the junction with the A499 to design standard *TD42/95 Geometric Design of Major / Minor Priority Junctions*. Widen the Class 3 road to a minimum of 5.5m.

Estimated Construction Cost

The improvement of the existing Class 3 road (1.4km long) and junction with A499 would be expected to include:

- Site clearance;
- Earthworks;
- Construction of new road, and;
- Construction of boundary walls.

The total estimated construction cost for this work would be £1.7 million.

- 2) Create a new access road (590m long, minimum 5.5m wide) from the A499 (north of Pwllheli) that ends next to Coleg Meirion Dwyfor. This option was previously considered as part of a previous feasibility report regarding future potential development in this area (Feasibility Report on Proposed Land Development Opportunities in Pwllheli, Draft 2, May 2006, YGC).

The improvement of the new access road (590m long), would be expected to include:

- Site clearance;
- Earthworks;
- Construction of new road & roundabout;
- Culverts, and;
- Construction of boundary walls.

The total estimated construction cost for this work would be £1.3 million.

- 3) Create a college bus link to reduce the number of cars travelling along the local road network and support more sustainable travel choices.

Access from A497 via Gaol Street and Salem Terrace

Due to the large number of students using Gaol Street and Allt Salem as a route to Coleg Meirion Dwyfor an increase of vehicles could create a conflict with pedestrians and students. A solution for this is to widen the carriageway at Allt Salem by using the available land on the west and create a footway link on the right hand side. The start of the proposed footway would link to Troed yr Allt and the footway access to the college.

The new footway and road surfacing would be expected to include:

- Site clearance;
- Earthworks;
- Construction of new 1.8m footway, 76m long, and;
- New road surfacing.

The total estimated construction cost for this work would be £250,000.

Access from Llannor area

For access from the Llannor area the following improvements are suggested (see Appendix A.1, Plan 4444/FE/05):

- Improve junction visibility opposite property of Hafren (north of Coleg Meirion Dwyfor)
- Improve junction visibility opposite the property of Cae Llan (west of Capel Denio)
- Improve junction visibility opposite the property of Bryn y Felin (south of Pont y Ddwryd)

The estimated construction cost of the junction improvements is £170,000.

Site 3

A499 South

Suggested improvements for access to and from Site 3 from the A499 south include (see Appendix A.1, Plan 4444/FE/06):

- Extend the existing footway provision to 2.5m (440m long) on the left hand side, and;
- Extend the existing 30mph limit to the northern extent of Site 3 in order to reduce vehicle speed on the entry into the site.

The estimated construction cost of extending the footway provision (2.5m wide, 440m long) and extending the existing 30mph limit would be £130,000.

A499 North

Suggested improvements for access to and from Site 3 from the A499 north include (see Appendix A.1, Plan 4444/FE/07 & FE/08):

- Extend the existing footway provision on the left hand side (430m long, 2.5m wide);
- Create a 40mph limit to the north end of Site 3, and;

The estimated construction cost of extending the footway and creating a 40mph limit would be £125,000.

Improve Lôn Nant – Stigallt: widening and improving the horizontal and vertical alignments of this unclassified road would give an alternative route to access Site 3 from the east (Cricieth / Porthmadog). It would also reduce congestion in Pwllheli town centre especially at the A497 / A499 roundabout. The improvement of Lôn Nant – Stigallt would be expected to include:

- Site Clearance;
- Earthworks;
- Widening of the road, and;
- New boundary walls.

The estimated construction cost of this work is estimated as being £400,000.

Table 3.1.1: Summary of Suggested Road Network Improvements and Estimated Costs

Sites 1 and 2	
<i>Suggested Road Network Improvement</i>	<i>Estimated cost</i>
Improve the Class 3 road from A499 junction with Bryn Tirion / Yoke House to Site 1	£1.7 million
Create a new access road from A499 (north of Pwllheli) that ends next to Coleg Meirion Dwyfor	£1.3 million
New footway and road surfacing along Gaol Street/Salem Terrace	£250,000
Junction improvements for access from Llannor	£170,000
COMBINED TOTAL	£3.42 million
Site 3	
<i>Suggested Road Network Improvement</i>	<i>Estimated cost</i>
A499 South: extend the footway provision and the existing 30mph limit	£130,000
A499 North: extend the footway and create a 40mph limit	£125,000
A499 North: Widening and improving Lôn Nant Stigallt	£400,000
COMBINED TOTAL	£655,000

3.2 Utilities capacity

The following utilities companies serve the areas in the vicinity of Sites 1, 2 and 3 and were therefore contacted to provide information regarding their respective existing utilities infrastructure.

- Electricity: Scottish Power
- Gas: Wales & West Utilities
- Telecommunications: BT
- Water supply: Dŵr Cymru/Welsh Water

The information that they have provided has been used to inform the baseline section of this chapter and to identify any opportunities and constraints associated with utilities capacity and supply at Sites 1 – 3.

Please refer to Appendix A.2 for supporting information (including site plans) provided by the utilities companies.

3.2.1 Baseline

Site 1

Gas

The nearest Gas Main, which is a 90mm diameter PE Low Pressure Main, is located approximately 193m south of the site boundary.

Electricity

Overhead high voltage, low Voltage and 33kV cables run through Site 1 and converge at the sub-station near Bryn Eglwys. Underground 33kV underground cables supply the residential properties at the extreme western edge of the site, where the cables follow the road which separates Sites 1 and 2. See Appendix A.2.

Telecommunications

Site 1 is supplied by overhead plant on the extreme western edge, where the overhead cables run along the road which separates Sites 1 and 2. Underground plant also runs east into Site 1 along the road towards Capel Deugorn, where it returns to overhead plant running north to supply Henllys. See Appendix A.2.

Water

There are two water mains, which run in a north-easterly direction into the western half of Site 1. However, there does not appear to be any sewerage infrastructure within close proximity of the site. See Appendix A.2 for plans showing the existing water mains at the site.

Site 2

Gas

The nearest Gas Main, which is a 90mm diameter PE Low Pressure Main, is located approximately 130m south-east of the site boundary. See Appendix A.2.

Electricity

A low voltage overhead line follows the road which bounds the north-eastern edge of the site and a high voltage overhead line crosses the northern section of the site. Underground 33kV cables supply those existing properties on the northern and eastern boundaries of the site. See Appendix A.2.

Telecommunications

Site 2 is supplied by overhead plant located on the extreme eastern edge of the site, where the overhead cables run along the road which separates Site 1 and Site 2. The overhead cables branch off into Site 2 to supply the cluster of houses known as Bryn y Felin, Bungalow Felin, Armon and Felin Uchaf, which are located on the north-western boundary of the site. See Appendix A.2.

Water

There are no water mains within Site 2, but an existing water main runs along the line of the road which bounds the eastern edge of the site and is the boundary between Sites 1 and 2. However, there does not appear to be any sewerage infrastructure within close proximity of the site. See Appendix A.2.

Site 3

Gas

The nearest Gas Main, which is a 90mm diameter PE Low Pressure Main, is located approximately 2.5m south of the site boundary. See Appendix A.2.

Electricity

There is currently no electricity infrastructure within Site 3, but there is a high voltage overhead line and low voltage underground cables to the south-west boundary of the site, which run along the track to Llwyn y Ffynnon. See Appendix A.2.

Telecommunications

Site 3 has overhead and underground plant running along the southern and eastern boundary of the site, with overhead plant branching off through the site north-eastwards towards Llwyn y Ffynnon and Plastirion. See Appendix A.2.

Water

A water main runs along the southern and eastern boundaries of the site and also along the track to Llwyn Ffynnon, which forms the south-western boundary of the site. A combined foul and surface water sewerage pipe runs beneath the A499 immediately to the south-west of the site. See Appendix A.2.

3.2.2 Suggested Improvements

Based on the baseline information summarised in Section 3.2.1, the following improvements are recommended in order to ensure that the Utilities infrastructure is sufficient to meet the additional demands created by new development in Sites 1 to 3. It should be noted that, due to the lack of information regarding the specific details of the proposed developments, it was not possible to obtain comprehensive information from all the utilities companies regarding the reinforcement needs, connection points and the costs associated with these.

Site 1

Gas

Wales & West Utilities were asked to provide information regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 1 to the existing gas network. The work required would involve connecting to the existing 125mm diameter PE LP gas main and then laying a new 250mm diameter PE LP gas main to the site boundary; a distance of approximately 264m. There would need to be reinforcement of the network for approximately 121m of the 180mm diameter PE LP to achieve the required gas demand. See Appendix A.2. The estimated cost for Wales & West Utilities to carry out this work is £114,072.

Electricity

Scottish Power were contacted regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 1 to the existing electricity network. They stated that, to provide detailed information on network capacity and reinforcement works and associated costs, further information would be required on the number of houses, the number of bedrooms, the type of heating used and the phasing of the work. If, however, a mixture of 3 and 4 bedroom houses is assumed, the loads required may be 475kVA. This would be supplied from a new secondary sub-station located centrally on the site, which would be fed from existing High Voltage lines currently crossing the site. A low voltage feed would then circulate through the site. It was noted that a diversion of electricity lines may be required to accommodate the housing, but this would have to be determined when a plan is available.

Telecommunications

Due to the close proximity of the underground and overground plant to the proposed site, it is not envisaged that there will be any problems with connecting to the existing telecommunications infrastructure. However, no information was provided by BT regarding the details and costs associated with connection to the existing infrastructure.

Water

Due to the close proximity of the existing water mains to Site 1, it is not envisaged that there will be any problems with connecting to the existing water mains infrastructure, although there is likely to be a higher cost associated with connecting to any sewerage infrastructure. However, no information was provided by Dŵr Cymru/Welsh Water regarding the details and costs associated with connection to the existing infrastructure.

Site 2

Gas

Wales & West Utilities were asked to provide information regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 2 to the existing gas network. The work required would involve connecting to the existing 125mm diameter PE LP gas main and then laying a new 125mm diameter PE LP gas main to the site boundary; a distance of approximately 139m. See Appendix A.2. The estimated cost for Wales & West Utilities to carry out this work is £37,640.

Electricity

Scottish Power were contacted regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 2 to the existing electricity network. They stated that, to provide detailed information on network capacity and reinforcement works and associated costs further information would be required on the number of houses, the number of bedrooms, the type of heating used and the phasing of the work. If, however, a mixture of 3 and 4 bedroom houses is assumed, the loads required may be 133kVA. Similar to Site 1, this would originate from a new secondary sub-station located centrally on the site, which would be fed from existing High Voltage lines currently crossing the site. A low voltage feed would then circulate through the site. Again, it is possible that a diversion of the existing high voltage cables would need to be re-routed depending on the location of the housing.

Telecommunications

Due to the close proximity of the underground and overground plant to the proposed site, it is not envisaged that there will be any problems with connecting to the existing telecommunications

infrastructure. However, no information was provided by BT regarding the details and costs associated with connection with to the existing infrastructure.

Water

Due to the close proximity of the existing water mains to Site 2 it is not envisaged that there will be any problems with connecting to the water mains infrastructure, although there is likely to be a higher cost associated with connecting to any sewerage infrastructure. However, no information was provided by Dŵr Cymru/Welsh Water regarding the details and costs associated with connection to the existing infrastructure.

Site 3

Gas

Wales & West Utilities were asked to provide information regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 3 to the existing gas network. The work required would involve connecting to the existing 90mm diameter PE LP gas main and then laying a new 125mm diameter PE LP gas main to the site boundary; a distance of approximately 19m. See Appendix A.2. The estimated cost for Wales & West Utilities to carry out this work is £14,895.

Electricity

Scottish Power were contacted regarding the proposed infrastructure improvements which would be required for connecting the proposed development at Site 3 to the existing electricity network. Due to the more limited load and rural location of this site, a smaller pole-mounted sub-station could provide the required load. The low voltage feed to individual houses could then be provided around the site.

Telecommunications

Due to the close proximity of the underground and overground plant to the proposed site, it is not envisaged that there will be any problems with connecting to the existing infrastructure. However, no information was provided by BT regarding the details and costs associated with connection to the existing infrastructure.

Water

Due to the close proximity of the existing water mains and sewerage infrastructure to Site 3, it is not envisaged that there will be any problems with connecting to the existing infrastructure. However, no information was provided by Dŵr Cymru/Welsh Water regarding the details and costs associated with connection to the existing infrastructure.

3.3 Landscape and visual character

The following information has been derived from the Landscape Appraisal Reports that were completed by Gillespies (landscape architects). See Appendix A.3 for the landscape appraisal plans relating to the three sites.

3.3.1 Baseline

Natural Resources Wales (NRW) provided the following comments with regard to landscape features within the study area. Their full response to the consultation can be viewed in Appendix B.

All of the potential sites are located within the Lley and Bardsey island Registered Landscape of Historic Interest. While this is not a statutory designation, Chapter 6 of Planning Policy Wales identifies that it should be a material consideration in the planning process and must be given due regard.

Therefore the JPPU must ensure that the potential effects on this landscape that could be caused by development at the three sites are fully considered when completing the JLDP.

Site Description

Site 1

Site 1 lies on the northern outskirts of Pwllheli at approximately 20-70m AOD and extends approximately 0.5km by 0.6km. It is an undulating site which largely comprises small to medium, (mostly irregular) pastoral fields, Deugorn Denio Chapel Cemetery, a substation and three residential properties. It is bordered on the south-western edge by residential properties along Allt Salem and by the block of residential properties north of Coleg Meirion Dwyfor.

The site is crossed by three narrow minor roads including Allt Salem which runs along its western boundary. The substation is located centrally within the site, at a height of 45m AOD adjacent to the minor road which runs east-west through the site. The cemetery lies to the west of the substation with the three residential properties in close proximity. A public footpath runs through the site for less than 100m, leading from the narrow minor road (east of the cemetery) to the ridge overlooking Pwllheli, before dropping down towards the town.

Site 1 exhibits a rural/urban edge character with low density residential development scattered along its Allt Salem boundary and a more open character along its northern edge, with longer views to the north and west across open fields and the broad shallow valleys of the Llŷn Peninsula, in the direction of Garn Boduan and Yr Eifl. The rising ridge acts as a visual barrier between the

site and Pwllheli, however views to and from Pwllheli have the potential to open up in the site area on the ridge, adjacent to the College, and could extend over Tremadog Bay and the Cambrian Coast. Users of the footpath have direct and open views over the upper eastern sections of the site and there are views from the cemetery to the surrounding site.

Site 2

Site 2 lies on the northern outskirts of Pwllheli, in an area known as Penrallt at approximately 40-50m AOD and is approximately 125-225m by 425m in extent. It is a gently-sloping site which largely comprises small to medium pastoral fields. It is bordered on the north-eastern edge by Allt Salem and a line of residential properties which face onto this road lie within the site. A public footpath crosses through the site from Allt Salem to Y Garn, a small rocky promontory to the south-west of the site.

The site exhibits a rural/urban edge character with low density residential development scattered along its Allt Salem boundary. The south and west areas of the site are contained by the rising landform of Y Garn and the low level vegetation (shrubs, trees and gorse) that line the lower reaches of the slope. The site is contained to the north and east by the strip of residential properties along Allt Salem.

Site 2 generally exhibits a more open character along its north-western edge, where the landform slopes down and the boundaries are marked by some low level hedgerows. Views are predominantly contained within the site, with potential for longer views to the north and west of the site across open fields and the broad, shallow valley in the direction of Llanor and Garn Boduan. The rising ridge acts as a visual barrier between the site and Pwllheli, however views to and from Pwllheli have the potential to open up in the site area adjacent to Y Garn residential property as landform begins to drop down towards Pwllheli and the site breaches the ridge line. These views could extend over Tremadog Bay and the Cambrian Coast.

Site 3

Site 3 lies to the north and west of the A499 Caernarvon Road on the north-eastern outskirts of Pwllheli. It is undulating with narrow pastoral fields bordered on one side by the A499 and on other sides by blocks of trees and shrubs, scrub and unkempt hedgerows. It is set within a shallow, but well defined, narrow valley (approximately 200m wide) that winds down towards the centre of Pwllheli and the coast.

The site area (approximately 440m in length, and 120m maximum at its widest point) exhibits a rural character with the neighbouring A499 exerting a distinctly urban and immediate influence, since there are no footpaths where the road borders the site. The wider area around the site

benefits from some strong containment afforded by mature perimeter hedgerows, banks of relatively low-lying trees, shrubs and vegetation on the sloping valley sides. Site 3 generally exhibits a more open character along its eastern edge, where it borders the A499 with a combination of low level hedgerow, banking and stone walling. Views are enclosed and contained within the winding narrow valley, with potential for very slightly longer views along the road and towards the edge of the Pwllheli settlement.

Landscape Character

'Landscape Character' Supplementary Planning Guidance was produced by Gwynedd Council to support the policies of the adopted development plan. The LCAs provide a meaningful framework of landscape units, of like character, around which policy or management or decisions can be made.

Site 1

Site 1 is within the Pwllheli-Cricieth Coast Landscape Character Area 8 and the Central Llŷn Landscape Character Area 10. The area is classified as "mosaic lowland rolling" (moderate) and "urban" (low).

Site 2

Site 2 is within the Pwllheli-Cricieth Coast Landscape Character Area 8; the area is classified as "mosaic lowland rolling" (moderate).

Site 3

Site 3 is within the Central Llŷn Landscape Character Area 10; the area is classified as "mosaic lowland rolling" (moderate) and "urban" (low).

Landform

Site 1

Site 1 is generally undulating with a change in level of 40m across the site. In general, the lower lying (30m AOD) and flatter areas are located in and around the cemetery towards the centre of the site. The landform rises in the south-east towards the coastal ridge (50m AOD) above Pwllheli, and to the south near the college. To the north-east, the land rises towards two individual properties (Henllys, Clogwynbach) and an area including disused quarries, up to a maximum height of 60m AOD. The rising landform affords some containment to the central areas of the site.

Site 2

Site 2 is a gently sloping site. The land rises along the length of the site from the north-west to the south-east towards the coastal ridge above Pwllheli, then crossing the ridge and beginning to descend towards the town.

Site 3

Generally undulating, the landform within Site 3 rises up the western valley sides and drops down the length of the valley as it approaches Pwllheli. In isolated pockets (at the edges of the southern-most area near Plas Tirion) it is steeply sloping.

Land Use

Site 1

The main land uses within Site 1 are agricultural pastureland with a small number of residential properties, a cemetery with a chapel and burial ground and an electricity substation and associated overhead electricity lines.

Site 2

The majority of Site 2 comprises pastureland. The small to medium-sized fields are contained by hedgerows, in places unmaintained and gappy with sections of post and wire fencing. Mature trees are found within the hedgerows. A variety of fence, wall, hedge and planting forms the boundary between the residential properties which front onto Allt Salem and the farmland.

Site 3

This site is used as pastureland.

Table 3.3.1: Site 1 - Dominant Landscape Elements and their Condition

<p>Hedgerow trees – where present trees are generally mature, scattered and unkempt. Some large hedgerow trees</p>	<p>Fences – some sections of post and wire amongst the hedgerow, and a post and wire fence across the field along the north west perimeter</p>	<p>Settlement – The three residential properties are scattered along the narrow minor roads and lie within close proximity to the cemetery. Residential properties are located along the perimeter of the site along Allt Salem, near Arfryn and the college</p>	<p>Railways – None</p>
<p>Field Pattern - small to medium sized, mostly irregular</p>	<p>Hedges – evident along most of the boundaries and some are sited on raised stone and earth banks (possible cloddiau)</p>	<p>Industry – Electricity substation</p>	<p>Power Lines – yes, evident in the area around the substation</p>
<p>Farmland – a mixture of improved and unimproved pastureland. Some scrubby areas</p>	<p>Walls – Stone walls evident along road sides and some field boundaries, including possible cloddiau. Some low, fragmented and covered in hedgerow vegetation</p>		<p>Streams – None apparent with the site – possible localised shallow ditches within hedgerows. Close proximity to one stream on the north west boundary of Site</p>
<p>Woodland – a small block located near the</p>			

disused quarries near Henllys	Roads – Allt Salem (minor road), 2 other narrow minor roads and private tracks, e.g., to Henllys	1
-------------------------------	---	---

Table 3.3.2: Site 2 - Dominant Landscape Elements and their Condition

<p>Hedgerow trees - some large mature trees scattered throughout the hedgerows</p> <p>Field Pattern - small to medium sized, broadly rectangular</p> <p>Farmland – pastureland with some scrubby areas in smaller fields</p>	<p>Fences – some sections of post and wire where hedgerows intermittent, and along the north west perimeter field</p> <p>Hedges – evident along most of the boundaries, and some are sited on raised stone and earth banks (potential cloddiau)</p> <p>Walls – Stone walls evident along road sides and some field boundaries (potential cloddiau). Some low, fragmented and covered in hedgerow vegetation. Stone and brick wall along the public footpath to Y Garn</p>	<p>Settlement – Residential properties are located along the perimeter of the site along Allt Salem, and at the southern point of the site (Y Garn)</p> <p>Industry – No</p> <p>Roads – Allt Salem (minor road) and private drive to Y Garn</p> <p>Woodland – None</p>	<p>Railways – None</p> <p>Power Lines – none apparent</p> <p>Streams – None apparent – possible localised shallow ditches within hedgerows</p>
---	--	--	---

Table 3.3.3: Site 3 - Dominant Landscape Elements and their Condition

<p>Hedgerow trees – where present trees are generally mature, scattered and unkempt</p> <p>Field Pattern - small to medium sized</p> <p>Farmland – unimproved pastureland</p> <p>Woodland – groups and banks of trees and shrubs along field perimeters</p>	<p>Fences – generally absent beyond some short sections of post and wire fencing parallel to the stone walls along the A499.</p> <p>Hedges – evident along the boundary of the A499. Some are sited on raised stone and earth banks (potentially cloddiau) to the north of Site 3</p> <p>Walls – Stone walls (including what appear to be cloddiau) evident along road sides. Some low, fragmented and covered in hedgerow vegetation. Stone wall along the private drive to Plas Tirion is ivy clad, intact and well maintained</p>	<p>Settlement – One individual property (Plas Tirion) visible within 200m of the site. Other scattered individual properties to the south of Site 3, on the outskirts of Pwllheli</p> <p>Industry - No</p> <p>Roads – A499 and private drive to Plas Tirion. Ancient stone track (approx. 2-4m wide, raised above field level and possibly a type of cloddiau) divides upper two fields of Site 3 and then runs to the far north western perimeter</p>	<p>Railways – None</p> <p>Power Lines – none apparent</p> <p>Streams – None apparent – possible localised shallow ditches</p>
---	---	---	--

Table 3.3.4: Site 1 – Ecological Associations

<p>Wildlife Corridors – hedgerows and strips of trees/shrubs</p> <p>Undisturbed Habitat – not evident</p> <p>Species Rich Grassland – not evident</p>	<p>Species-rich hedgerow - potentially</p> <p>Woodlands – potentially</p> <p>Scrub – potentially</p>	<p>Ditches – possibly present within hedgerows and field boundaries</p> <p>Rough Grass – evident in some fields</p> <p>Ponds – none evident</p>	<p>Streams – none evident</p> <p>Railway Corridor – N/A</p> <p>Gardens – border the site, and lie within it</p>
--	---	--	--

Table 3.3.5: Site 2 – Ecological Associations

<p>Wildlife Corridors – hedgerows</p> <p>Undisturbed Habitat – not evident</p> <p>Species Rich Grassland – not evident</p>	<p>Species-rich hedgerow - potentially</p> <p>Woodlands – not evident</p> <p>Scrub – limited</p>	<p>Ditches – possibly present within hedgerows and field boundaries</p> <p>Rough Grass – evident in the fields behind the properties along Allt Salem</p> <p>Ponds – none evident</p>	<p>Streams – none evident</p> <p>Railway Corridor – N/A</p> <p>Gardens – mixed boundaries and planting within gardens of properties on Allt Salem</p>
---	---	--	--

Table 3.3.6: Site 3 – Ecological Associations

<p>Wildlife Corridors – hedgerows and narrow banks of trees/shrubs</p> <p>Undisturbed Habitat – not evident</p> <p>Species Rich Grassland – not evident</p>	<p>Species-rich hedgerow - potentially</p> <p>Woodlands – small banks of trees/shrubs</p> <p>Scrub – not evident</p>	<p>Ditches – possibly present within wooded areas</p> <p>Rough Grass – none evident</p> <p>Ponds – none evident</p>	<p>Streams – none evident, but possibly present in ditches. Water run-off from the valley sides is likely to gather, then drain, into the field at the southern-most point of Area 3 (where a watercourse begins)</p> <p>Railway Corridor – N/A</p> <p>Gardens – N/A</p>
--	---	--	---

Table 3.3.7: Site 1 – Scenic Quality

Aesthetic Factors				
Scale	Intimate	Small	Large	Vast
Balance	Chaotic	Discordant	Balanced	Harmonious
Enclosure	Confined	Enclosed	Open	Exposed
Diversity	Complex	Diverse	Simple	Uniform
Form	Vertical	Sloping	Rolling	Flat/horizontal
Line	Sinuous	Curved	Angular	Straight
Colour	Garish	Colourful	Muted	Monochrome
Pattern	Random	Organised	Regular	Formal
Movement	Busy	Calm	Still	Dead
Perceptions/Impressions				
Security	Threatening	Unsettling	Safe	Comfortable
Stimulus	Boring	Interesting	Attractive	Inspiring
Familiarity	Ordinary	Familiar	Unusual	Striking
Management	Derelict	Disturbed	Tended	Manicured
Productivity	Barren	Sparse (in places)	Productive (in places)	Lush

Table 3.3.8: Site 2 – Scenic Quality

Aesthetic Factors				
Scale	Intimate	Small	Large	Vast
Balance	Chaotic	Discordant	Balanced	Harmonious
Enclosure	Confined	Enclosed	Open	Exposed
Diversity	Complex	Diverse	Simple	Uniform
Form	Vertical	Sloping	Rolling	Flat/horizontal
Line	Sinuous	Curved	Angular	Straight
Colour	Garish	Colourful	Muted	Monochrome
Pattern	Random	Organised	Regular	Formal
Movement	Busy	Calm	Still	Dead
Perceptions/Impressions				
Security	Threatening	Unsettling	Safe	Comfortable
Stimulus	Boring	Interesting	Attractive	Inspiring
Familiarity	Ordinary	Familiar	Unusual	Striking
Management	Derelict	Disturbed	Tended	Manicured
Productivity	Barren	Sparse (in places)	Productive (in places)	Lush

Table 3.3.9: Site 3 – Scenic Quality

Aesthetic Factors				
Scale	Intimate	Small	Large	Vast
Balance	Chaotic	Discordant	Balanced	Harmonious
Enclosure	Confined	Enclosed	Open	Exposed
Diversity	Complex	Diverse	Simple	Uniform
Form	Vertical	Sloping	Rolling	Flat/horizontal
Line	Sinuous	Curved	Angular	Straight
Colour	Garish	Colourful	Muted	Monochrome
Pattern	Random	Organised	Regular	Formal
Movement	Busy	Calm	Still	Dead
Perceptions/Impressions				
Security	Threatening	Unsettling (Proximity to	Safe	Comfortable

		road)		
Stimulus	Boring	Interesting	Attractive	Inspiring
Familiarity	Ordinary	Familiar	Unusual	Striking
Management	Derelict	Disturbed	Tended	Manicured
Productivity	Barren	Sparse	Productive	Lush

Attractors and Detractors

Site 1

The following Attractors have been identified for Site 1:

- The site marks the transition from a semi-urban to a rural setting. There are limited views from the public footpath but it provides a useful link into Pwllheli from the north.
- The cemetery/burial ground is a valued, tranquil and contemplative space.

Detractors include an electricity substation and associated overhead lines.

Site 2

Most of Site 2 appears to be in private (farmed) ownership except for the public footpath which runs from Allt Salem towards the rocky promontory at Y Garn. There are open and extensive views from the Y Garn viewpoint (which lies outside the site boundary) over the internal landscape of the Llŷn Peninsula, the Cambrian Coast and Tremadog Bay, and as such, this is a locally-valued footpath. The site at present marks the transition from the semi-urban edge of Pwllheli to a rural setting.

There are no evident detractors in Site 2, other than some unkempt field boundaries.

Site 3

As the site is primarily privately-owned and has no public footpaths, the landscape is, on the whole, experienced from the road, thus limiting the parts of the landscape that could be considered valuable.

The road is a detractor adjacent to Site 3 with its noise and fast-moving (50mph) traffic along the single carriageway A499.

Rarity

For all sites, the landscape elements that construct the scenery are not intrinsically rare, although the potential presence of cloddiau would need investigating further if the sites were to be developed.

Representativeness

Site 1

The landscape, although quite attractive, is not untypical of that surrounding much of Pwllheli, and is relatively typical of the mosaic, rolling, lowland valleys and pastureland characteristic within Gwynedd. Proximity to the Y Garn promontory adds value to the landscape, adding to the rural experience of climbing Y Garn and contributing to the transition from urban Pwllheli to the rural outskirts.

Site 2

The landscape is attractive and typical of that surrounding much of Pwllheli, and is relatively typical of the mosaic, rolling, lowland valleys and pastureland characteristic within Gwynedd. Proximity to the Y Garn promontory adds value to this landscape – at present it adds to the rural experience of climbing Y Garn and marks the transition from urban Pwllheli to the rural outskirts.

Site 3

The landscape, though quite attractive, is not untypical of that surrounding much of Pwllheli, and is relatively typical of the mosaic, rolling, lowland valleys and pastureland characteristic within Gwynedd. In addition, views are entirely contained within this small and localised valley, and therefore lend less value to the wider scenery.

Visual Amenity / Analysis (internal / external site visibility)

The Visual Envelope is the area in which a proposed development may be visible and visual receptors are those within the visual envelope that could be affected by views of the development/s.

Visual Envelope: Site 1

Within the lower valley area, the visual envelope is reasonably contained with potential for some longer views over Site 1 from the north. As the landform of the site rises toward the ridge overlooking Pwllheli, Site 1 is visible from scattered properties that lie across the broad shallow valley in the direction of Garn Boduan and Yr Eifl to the north.

The site lies approximately 7km from the Llŷn Peninsula AONB, and although it may be visible from this designated landscape, effects are likely to be very limited.

On the eastern edge of Site 1, views are contained by an increase in mature trees and small blocks of trees and scrub. The ridge to the south-east acts as a visual barrier between Site 1 and

Pwllheli, however views to and from Pwllheli open up the site from the higher points along the ridge. These views could potentially extend to cover Tremadog Bay and the Cambrian Coast.

Visual Envelope: Site 2

The visual envelope is reasonably contained within the perimeter of Site 2. There is the potential for longer views to the site from scattered properties which lie in the direction of Llanor and Garn Boduan, across the broad, shallow valley as it rises up to the ridge above Pwllheli.

In addition, the envelope extends to properties and the College on the opposite side of Allt Salem through gaps between properties, low field boundaries and breaks in the field boundaries. The rising ridge acts as a visual barrier between the site and Pwllheli, however views to and from Pwllheli have the potential to open up in the site area adjacent to Y Garn residential property as landform begins to drop down towards Pwllheli.

Visual Envelope: Site 3

The visual envelope is contained within the narrow valley in which Site 3 is situated, with longer views of the area experienced up to 500m along the length of the A499 as it approaches Pwllheli from the north, and as it heads into Pwllheli in a south-west direction on the very edge of the settlement.

Visual Horizon(s): Site 1

The visual horizon shifts from the perimeter of the site (views from within are sometimes foreshortened to the perimeter), to the residential properties along Allt Salem and near Arfryn, and to the north and west over the inland area of the Llŷn Peninsula to the range of hills in the north. To the south and west the visual horizon terminates at Y Garn and at the ridge above Pwllheli. At this point there is potential for the visual horizon to extend over the Tremadog Bay.

Visual Horizon(s): Site 2

The visual horizon shifts from the perimeter of Site 2 (views from within the site are sometimes foreshortened to the perimeter), to the residential properties along Allt Salem, and to the north and west over the inland area of the Llŷn Peninsula to the range of hills in the north. To the south and west the visual horizon is formed by the coastal ridge at Y Garn, which the south-eastern extent of the site breaches as it extends slightly over the ridge line. At this point there is potential for the visual horizon to extend over Tremadog Bay.

Visual Horizon(s): Site 3

The visual horizon is effectively the perimeter of Site 3 (views from within the site are sometimes foreshortened to the perimeter) or the edge of the immediate valley. Adjacent to the private road to Plas Tirion, on the upper slope of the narrow valley, the horizon stretches towards Llanbedrog.

Internal Visual Barrier(s) (e.g. degree of internal site compartmentalisation): Site 1

The site is mostly characterised by small to medium-sized, sloping, pastoral fields, which are contained by fragmented hedgerows and mature shrubs and trees. Some visual containment is afforded by existing tall mature trees on field boundaries. In addition the topography compartmentalises some of the upper sections on the eastern edge of the site. As such Site 1 is relatively open in character, but some areas are somewhat compartmentalised and fragmented by vegetation and landform.

Internal Visual Barrier(s) (e.g. degree of internal site compartmentalisation): Site 2

Site 2 is characterised by mostly small to medium-sized, slightly sloping, pastoral fields, contained by fragmented hedgerows, most of the immediate site is relatively open in character. Some visual screening is afforded by existing tall mature trees on field boundaries.

Internal Visual Barrier(s) (e.g. degree of internal site compartmentalisation): Site 3

Site 3 is characterised by mostly small to medium-sized, slightly sloping, pastoral fields, contained by mature fragmented hedgerows and small mature shrubs and trees, most of the immediate site is open in character and without strong visual containment.

Visual receptors

Visual receptors are individuals and/or defined groups of people within the visual envelope who have the potential to be affected by a proposal. Visual receptors should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views. Residential properties are usually the most susceptible to change and as such are classed as high sensitivity receptors, as are people whose primary purpose is the enjoyment of the countryside, e.g. users of long distance footpaths.

Site 1

The properties which lie adjacent to the site (including those along Allt Salem and near Arfryn, and the two properties at Henllys and Clogwynbach) have views over Site 1. The visual envelope also extends to the rear of the college buildings. Existing views are predominantly rural in nature and largely uninterrupted. Henllys and those properties near Arfryn experience longer views over the burial grounds. Views over Site 1 are generally open and direct; however existing field boundaries

afford some localised containment, as does the landform. As such, the nature of views varies (open views, glimpses, direct, indirect).

There are three residential properties within the site that experience direct open views of Site 1 from their properties and gardens. Existing views are predominantly rural in nature, comprising of open fields and hedgerow boundaries containing some mature trees. The properties in close proximity to the cemetery experience views over the burial grounds. Views are largely uninterrupted, except some containment afforded by existing hedgerows and trees within field boundaries, and by landform.

Other medium sensitivity receptors inside the site's visual envelope include users of the footpath on the site and users of the cemetery. Users of the footpath experience views over adjacent fields and hedgerows. These views are contained by field boundaries. Visitors to the cemetery experience direct and mostly open views of Site 1 on all sides, with hedgerows and trees affording some containment and acting as visual screens.

Properties scattered in the inland area north and east of Site 1 potentially experience views over the site at varying distances and varying in nature.

Users of the footpath running up Y Garn (approximately 200m distant from the closest point of Site 1) experience direct and open views over the whole site. Users of the viewpoint at Y Garn experience direct and open views over the site.

Vehicle users along Allt Salem and the minor road through Site 1 are classed as low sensitivity receptors and experience both immediate and/or indirect views at varying distances.

Site 2

Residents along Allt Salem experience both immediate and open views of Site 2. The residential property at Y Garn has both open and direct views, and some indirect views over the site, since it borders their private drive and garden. Intervening vegetation provides some screening. Residents on the opposite side of Allt Salem experience indirect views and glimpses, or direct and open views (particularly those close to the College). Intervening vegetation and other residential properties provide some screening

Footpath users experience open, direct views over the site as the footpath passes through it, and as it travels along and up the north eastern slope of Y Garn.

Users of the college experience some direct and open views over Site 2. Intervening vegetation and other buildings provide some screening.

Properties scattered in the inland area north and east of the site may experience views over Site 2 at varying distances and varying in nature (oblique, direct, open, glimpses, *etc.*) since both landform and intervening vegetation may screen views.

Site 3

As the visual envelope of the site is mostly contained, the number of visual receptors is very small. There are a small number of adjacent residential properties (including Llwyn-ffynnon, Plas Tirion and a group to the south side of the A499 near to the eastern edge of the urban area of Pwllheli) which may have limited partial and screened views of the site. Intervening vegetation screens most of the views over Site 3. There would be clear views of the site from the private access road to Plas Tirion. These residential receptors are classed as high sensitivity.

Vehicular users of the A499 have views over Site 3, with field boundaries and intervening vegetation screening partial views; these users are classed as low sensitivity.

Only a short section of the road near the eastern edge of Pwllheli has a pedestrian pavement. Pedestrian receptors would be considered medium sensitivity, and at present have glimpsed views of the site.

Surrounding / Context Landscape Character

Quality / Character of neighbouring areas: Site 1

Site 1 borders the semi-rural northern edge of Pwllheli which is residential in character. The urban edge is characterised by mixed low density housing of various ages, distributed along the minor roads. The properties are interspersed with gardens and individual fields. The properties are mostly detached (with some semi-detached and terraced rows) and have private well-tended gardens and drives. The local sixth form college lies adjacent to the south-east edge of the site.

Quality / Character of neighbouring areas: Site 2

Site 2 abuts the semi-rural area north of Pwllheli that is residential in character. The local sixth form college lies less than 50m from the site on the opposite side of Allt Salem on the south-east edge of the site. The area is characterised by mixed housing of low density, scattered along the minor roads, with both old and newer houses. The properties are interspersed with gardens and individual fields.

Quality / Character of neighbouring areas: Site 3

Site 3 abuts the urban area north-east of Pwllheli that is residential in character with some retail development (such as a petrol station and small supermarket). The area is characterised by mixed housing of medium density, with both old and new-build houses and flats, interspersed with gardens and small green spaces that displays a mixed residential character.

Contribution that the site makes to the setting of town: Site 1

Site 1 sits on the urban edge of Pwllheli but has a strong rural character and therefore provides a positive visual edge to the mature settled urban area, in that it marks the transition from settlement to open farmland. In addition, the site contains the cemetery, and the semi-rural character of the site aids in creating a sense of tranquillity within the cemetery grounds.

Contribution that the site makes to the setting of town: Site 2

This is an urban edge site with a strong rural character; as such the site provides a positive visual contribution to the mature, settled urban edge for residents and footpath users in that it marks the transition from settlement to open farmland.

Contribution that the site makes to the setting of town: Site 3

Like many urban edge sites with a strong rural character, the existing site provides a positive visual contribution to the mature, settled, urban edge and provides a clear transition point from urban settlement to a rural landscape.

Degree of Urbanisation: Site 1

Site 1 is attractive and has an inherent rural character, although its proximity to settlement on the urban edge of north Pwllheli and varied land use including the substation imparts a slight degree of urbanisation to the site.

Degree of Urbanisation: Site 2

Site 2 is quite attractive and has an inherent rural character. Proximity to settlement on the urban edge of Pwllheli imparts a slight degree of urbanisation to the site.

Degree of Urbanisation: Site 3

Whilst Site 3 is quite attractive with an inherent rural character, proximity to the urban edge of Pwllheli and the A499 imparts a degree of urbanisation to the site, as do the views to the south-west along the A499, from which the nearby petrol station is visible.

Landscape Condition: Site 1

The farmed landscape is in a generally well-maintained condition. In places, the hedgerows are overgrown and unkempt, and the grass is slightly scrubby, which locally lowers the condition of the landscape.

Landscape Condition: Site 2

As with Site 1, the landscape is farmed and is in a reasonably well-maintained condition. In places the hedgerows are overgrown and the grass is slightly scrubby, which somewhat lowers the condition of the landscape.

Landscape Condition: Site 3

Hedgerows are overgrown and unkempt, and the grass is slightly scrubby with marshy areas, which somewhat lowers the condition of the landscape. The landscape is in a reasonably well-maintained condition.

3.3.1.11 Recreation and Amenity

Table 3.3.10: Recreation and amenity facilities within Sites 1 - 3

	Site 1	Site 2	Site 3
Formal facilities	cemetery	none apparent	none apparent
Informal facilities	public footpath	public footpath	none apparent

3.3.1.12 Landscape & Planning Policy Designations

Site 1

Site 1 is not covered by any national or regional landscape, nature conservation or heritage designations (e.g. AONB, National Park, and Landscapes of Outstanding Historic Interest, Llŷn Heritage coast, SSSI or SAC, Gwynedd UDP Landscape Conservation Areas UDP Policy B10).

A section of the westernmost part of the site is zoned for housing (policy CH1) within the Gwynedd UDP (July 2009).

The site lies within the ‘Central Llŷn’ Landscape Character Areas No.8 and 10.

LANDMAP categories of relevance for Site 1 include Visual & Sensory VS044 Central Llŷn plateau (mosaic rolling lowland, moderate evaluation), Habitat H523 (mosaic, moderate) & H471 (improved grassland, moderate) and Historic HL589 Pwllheli (nucleated settlement, high evaluation).

Site 2

An area of Site 2 is zoned for a housing proposal (CH1) in the Gwynedd UDP (July 2009).

The site lies within the 'Pwllheli – Cricieth Coast' Landscape Character Area No. 8.

LANDMAP categories of relevance for Site 2 include Visual & Sensory VS044 Central Llŷn plateau (mosaic rolling lowland, moderate evaluation) and Historic HL829: part of the site is classified as the eastern edge of Boduan parkland (Designed, high evaluation).

Site 3

The area between the petrol station and the private drive to Plas Tirion is zoned for housing (CH1) and Employment (D3 – B1, B2 & B8 use classes) proposals in the Gwynedd UDP (July 2009).

The site lies within the 'Pwllheli – Cricieth Coast' Landscape Character Area No.8

LANDMAP categories of relevance for Site 3 include Visual and Sensory: the western edge of the site is part of VS045 Pwllheli (Urban, low) with the rest being VS044 Central Llŷn plateau (mosaic rolling lowland, moderate) and Historic: the site is part of HL589 Pwllheli (Nucleated settlement, high).

3.3.2 Landscape Analysis

3.3.2.1 Constraints to Development

Existing Land Uses: Site 1

A number of areas within Site 1 are already in allocated use, including a cemetery, electricity infrastructure, a public footpath and access roads to a number of properties. Some of these may be considered detractors to residential development. The public footpath will need to be retained or its route diverted. The current road network within the site is narrow and widening may be required to facilitate development and future access.

Existing Land Uses: Site 2

Existing land use does not constrain the development of the site in landscape and visual terms. The area available for development consists of seven gently-sloping fields with predominantly hedgerow and post and wire fence boundaries. Access to the site would be via the minor road (Allt Salem) which could present certain constraints regarding access and the scale of development. The public footpath to Y Garn presents a physical break in the development site.

Existing Land Uses: Site 3

The area proposed for development is generally constrained to the valley floor and matches the existing limits of the open fields. The site is narrow and bordered to the south by the A499 and to the north by steeper, vegetated topography.

The A499 is a major approach road into Pwllheli from the east with reasonably high traffic speeds (50mph, reducing into 30mph as you approach Pwllheli).

There is a private drive to Plas Tirion running to the north in the centre of the site. The private drive to Plas Tirion presents a physical break in the development site.

Landscape Character: Site 1

A narrow, tree-lined lane which helps define the character of the area runs through the middle of the site. Access to Site 1 would be via this lane and other narrow minor roads. Poor existing access could present certain site constraints regarding access and the scale of development.

If any TPOs are present these must be considered in the site layout or consent must be obtained for their removal.

The substation and its associated power lines form a visual detractor on the site.

Landscape Character: Site 2

Whilst there are no individual features that form a constraint to development, the site currently has a rural / agricultural character with a number of field boundaries and forms a soft, permeable edge to the north of the urban area of Pwllheli. Some stone and brick boundaries are evident and would need further investigation to identify the potential presence of cloddiau.

If any TPOs are present these must be considered in the site layout or consent must be obtained for their removal.

Landscape Character: Site 3

The potential presence of cloddiau (earth and stone banks along field boundaries and the track) may involve further investigation and potentially conservation.

Planning Designations: Site 1

Planning designations do not form a constraint to development on Site 1. An area of the site is already zoned for housing development (policy CH1) as defined in the UDP (July 2009).

Planning Designations: Site 2

Planning designations do not form a constraint to development on Site 2. An area of the site is already zoned for housing development (policy CH1) as defined in the UDP (July 2009).

Planning Designations: Site 3

Designations do not form a constraint to development on Site 3, although it is part designated for housing proposal (policy CH1) and part for employment proposal (D3 – B1, B2 or B8 use classes) within the Gwynedd UDP (July 2009).

Topography: Site 1

Site topography does not form a constraint to development on Site 1. A number of wells and springs are located on site and a watercourse (which is classified as a 'main river' by the Environment Agency) is located just beyond the north-west border of the site. Drainage issues may need further investigation but flooding is unlikely to be a significant constraint.

Topography: Site 2

There is a level change of approximately 20m along the length of Site 2 (from 25-45m AOD), which is unlikely to present any significant constraint to development.

Topography: Site 3

The site is narrow and sloping and is bordered to the north by steep, vegetated topography. The western edge of the site is lower (by approximately 1m) than the adjacent road. The level changes, along with the general narrow nature of Area 3 and the speed of traffic along the A499 presents certain site constraints regarding access and the scale of development.

The open field sections to the north of Area 3 are reasonably level, with the lower field section presenting more of a challenge in terms of topography and level changes.

There is a spring marked on the map, indicating possible issues with drainage on site.

Potential public concerns: Site 1

There may be potential concerns expressed by:

- Residents from properties within the site and those whose properties border it, and;
- Visitors to the cemetery and users of the public footpath

These concerns are likely to focus on the increase in urban influences on the existing semi-rural landscape, loss of valued landscape elements, direct effects on views and loss of tranquillity and increased traffic levels along the narrow minor roads.

Potential public concerns: Site 2

There may be potential concerns from:

- Residents within the site and those whose properties border it, and;
- Users of the public footpath and viewpoint at Y Garn

These concerns are likely to focus on the increase in urban influences on the existing semi-rural landscape, effects on views and loss of tranquillity and increased traffic levels along the narrow minor roads.

Potential public concerns: Site 3

There may be potential concerns from:

- Residents within the site and those whose properties border it;

There may be potential concerns about linear 'ribbon' development along the road corridor and potential safety concerns over increased traffic levels along the A499.

Sensitivity to potential development

In this case this refers primarily to the inherent sensitivity of the landscape itself, irrespective of the type of development change that may be under consideration. Sensitivity relates to an assessment of the quality of the landscape (expressed through national, regional or local designations), its character and its context, the site's visibility appraisal, the presence of attractors and detractors and the overall condition of the landscape. Sensitivity is measured on a scale of high / medium / low.

Site 1

Site 1 is not nationally or regionally designated. In the LANDMAP assessment, its Visual and Sensory and Habitat evaluation is moderate, but its Historic evaluation is high as it forms part of the edge of the historic settlement of Pwllheli. Due to the potentially sensitive nature and number of visual residential receptors, it is considered that this site is potentially of medium – high sensitivity to development.

Site 2

Site 2 is not nationally or regionally designated. In the LANDMAP assessment, its Visual & Sensory evaluation is moderate, but its historic evaluation is high as it forms part of the eastern edge of the Boduan parkland, it does not fall within any outstanding LANDMAP evaluations. Due to the potentially sensitive nature of visual residential receptors, it is considered that this site is of medium - high sensitivity to development.

Site 3

Site 3 is not nationally or regionally designated. In the LANDMAP assessment, its visual and sensory evaluation is low to moderate with a high historical evaluation to its western edge. Due to the low number of potentially sensitive receptors, it is considered that this site is potentially of low sensitivity to development.

3.3.3 Potential Effects of Development

Landscape effects can occur:

- in the fabric of the landscape as a result of removal of or changes in individual elements or features;
- on aesthetic aspects (e.g. scale, sense of enclosure, diversity, pattern & colour, perceptual – sense of remoteness, tranquillity, naturalness etc.), or;
- on the overall character of the landscape.

Landscape Receptors: Site 1

In general terms, development will alter the rural character of Site 1 and change the character of the northern edge of Pwllheli.

Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns.

Within LCA 10 proposals for development around settlement edges should reflect the character of existing settlement, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns. Developments should integrate into the vernacular of the area. Impacts on the wider landscape should be considered.

Site 1 forms only a small element of LCA Areas 8 and 10, so effects on the LCAs are likely to be negligible.

Landscape Receptors: Site 2

In general terms, development will alter the rural character of Site 2 and change the character of the northern edge of Pwllheli.

Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns. The site area forms only a small element of the overall LCA 8, so effects on the character area are likely to be negligible and therefore not significant.

Landscape Receptors: Site 3

Development could alter the rural character of this site and change the character of the eastern edge of Pwllheli.

Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns. The site forms only a small element of the overall LCA, so effects are likely to be negligible and therefore not significant.

Effects on landscape character of Site 1

The site has a rural feel with hedgerows and a number of mature hedgerow trees defining open pastoral fields and a small block of woodland.

Development on the site could result in the loss of its rural/agricultural feel and it currently forms a soft, permeable edge to the northern urban area of Pwllheli. Depending upon the nature of development, effects on overall landscape character could potentially be significant.

Effects on landscape character of Site 2

Development on the site could result in the loss of its rural/agricultural feel and it currently forms a soft, permeable edge to the north of the urban area of Pwllheli. Depending on the nature of the development proposed, effects on overall landscape character could potentially be significant.

Effects on landscape character of Site 3

Development on the site could result in the loss of its rural/agricultural feel and it currently forms a soft, permeable edge to the east of the urban area of Pwllheli. Depending on the nature of the development proposed, effects on overall landscape character could potentially be significant.

Effects on landscape elements: Site 1

Both the development and its associated access routes are likely to affect landscape elements. Maximising the potential of the development could involve clearance of existing landscape features. Access to the site would be via narrow minor roads and this could present certain site constraints resulting in road widening and junction improvements which may be necessary to facilitate development. Potential road widening operations would affect the narrow tree-lined lane which runs through the site. Development may also result in the loss of strong hedgerow boundaries with hedgerow trees. Depending upon the nature of development, effects on landscape elements could potentially be significant.

Effects on landscape elements: Site 2

Access to the site would be via Allt Salem and could present certain site constraints regarding access and the scale of development. New access and internal roads may be necessary which could impact upon the field boundaries of the area which contribute towards its rural character. Depending on the nature of the development proposed, effects could potentially be moderate.

Effects on landscape elements: Site 3

Access to the site would be from the A499 and could present certain site constraints regarding access. Additional road accesses and internal roads may be necessary to facilitate development. Development could result in the loss of the limited hedge boundaries and potential cloddiau.

Aesthetic aspects: Site 1

Existing site users (residents and those visiting the cemetery) would potentially experience a significant change to the existing sense of naturalness, tranquillity and remoteness.

Aesthetic aspects: Site 2

Existing site users (residents and users of the footpath) would potentially experience a significant change to the existing sense of naturalness, tranquillity and remoteness.

Aesthetic aspects: Site 3

As Site 3 does not have a sense of remoteness or tranquillity, effects on aesthetic perceptions of the site are likely to be limited.

Visual Receptors

Visual effects are effects on specific views and on the general visual amenity experienced by people. Visual receptors are individuals and / or defined groups of people who have the potential to be affected by a proposal.

Site 1

Much of the visual envelope of Site 1 is contained within close proximity to the site, extending just beyond field boundaries to neighbouring properties and buildings and to the rising landform along the ridge above Pwllheli.

Residential properties (high sensitivity receptors) immediately adjacent to or within the site will experience direct and open views of the development (though their views will differ in nature depending on the location of the property within the site, the location and nature of development proposals and the potential retention of mature field boundaries). Since their existing view is rural, the impact on their visual amenity would be likely to be significant.

Whilst there are longer views over the landscape to the north, potential receptors are unlikely to perceive any significant changes in their view due to the scale of the site and its location on the edge of an existing settlement; hence effects are likely to be not significant.

Visitors to the cemetery (medium sensitivity) will experience open, direct and relatively long views over the potential development site. The visual effects on users of the cemetery would likely be significant, depending on the nature of the development.

The effects on users of the public footpath (medium - high sensitivity) would potentially be significant, depending on the nature of the development and any screen planting or retention of existing vegetation.

Views from the viewpoint at Y Garn (a high sensitivity receptor) would be affected by the more immediate presence of the development and a change in the character and nature of the view which is currently predominantly rural. Potential effects are likely to be significant.

Properties scattered in the inland area north of Site 1 may experience views over the development at varying distances and varying in nature (oblique, direct, open, glimpses, *etc.*). Receptors in the more distant areas in the north are unlikely to perceive changes in their view if the site is developed, so effects are likely to be negligible.

Users of the college (low sensitivity receptor) will experience direct and open views over the site, but due to this receptor's low sensitivity effects are not likely to be significant.

Road users (low sensitivity receptor) will experience glimpses and more direct open views of the site as they travel along its boundary and through the site. These effects would be localised (depending on the nature and location of development, localised screening *etc.*) but given the low sensitivity of the receptor type would be unlikely to be significant.

Effects resulting from buildings breaching the ridgeline above Pwllheli are unlikely unless development is on a large scale.

Site 2

Much of the visual envelope of Site 2 is contained within close proximity to the site, extending just beyond field boundaries to neighbouring properties and the College and to the rising landform along the ridge above Pwllheli and Y Garn.

Residential properties which are immediately adjacent to and opposite the site will experience direct and open views of the potential development, and since their existing view is rural the potential effect on their visual amenity would potentially be significant, depending upon the nature of the development.

The effects on users of the public footpath and the viewpoint at Y Garn (a high sensitivity receptor) would potentially be significant as they would be affected by the more immediate presence of the development and a change in the character and nature of the view which is currently predominantly rural.

Whilst there are longer views over the landscape to the north, receptors in this area are unlikely to perceive any significant changes in their view due to the scale of the plot and its location on the edge of an existing settlement, hence effects are likely to be minor or negligible.

Site 3

Much of the visual envelope of Site 3 is contained along the A499. There are a small number of high sensitivity residential receptors close to the site. At most, these receptors would have partial filtered views of the development, since the topography and existing vegetation would screen the properties from potential development within the site. Potential effects are therefore not likely to be significant.

The open character of the site limits the ability of the existing landscape features to effectively screen potential development from the road.

Vehicular users of the A499 road corridor will have open and direct views across the proposed development site, but due to their low sensitivity it is unlikely that they would experience a significant effect.

Only a short section of the road near the eastern edge of Pwllheli has a pedestrian pavement and pedestrians would be likely to experience glimpses of the development. Pedestrian receptors would be considered medium sensitivity, and as such the potential effects are not likely to be significant.

Setting, visibility & visual receptors: Site 1

Containment of Site 1 is good with views limited to the immediate area. Residential properties along Allt Salem and the three residential properties within Site 1 have views over the site which may form a potential constraint to development due to effects on their residential and visual amenity.

Setting, visibility & visual receptors: Site 2

Containment of Site 2 is very good with views limited to the immediate area. There are views over Site 2 from the residential properties along Allt Salem which may form a potential constraint to development due to effects on their residential and visual amenity. Potential effects on views from the local valued viewpoint at Y Garn may also form a potential constraint to development.

Setting, visibility & visual receptors: Site 3

There are limited internal barriers within the site, which is generally open in character. There are limited views out of and into the site, primarily along the A499 road corridor. Containment of the site is very good with views limited to the immediate valley area and along the A499.

3.3.4 Indicative Development Principles

Site 1

The following potential issues should be considered:

- The potentially high visual effects of development on sensitive receptors such as residential properties within and around the boundary of the site, and users of the viewpoint at Y Garn.
- The degree and desirability of settlement extension into rural land to the north of Pwllheli.
- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development, though the quality of these features would need further investigation, and;
- Access and construction traffic movements along Allt Salem.

The following mitigation measures should be considered as opportunities to reduce the impact of development at Site 1:

- Potential retention of some mature landscape features, particularly including mature trees in the hedgerow boundaries within the site may offer some opportunities to sympathetically articulate, frame and arrange new-built development;
- Internal screening and the retention of field boundaries where possible will mitigate potential visual effects from residential properties, but will have little effect on views from Y Garn due to the elevated nature of the viewpoint;
- Development could alter the rural character of this site and change the character of the northern edge of Pwllheli, though if green space and screening is maintained / built into the development proposal this effect could be reduced, and;
- Site 1 is much larger than Sites 2 or 3 and therefore offers more scope for integrating (the same volume of development as could be proposed on the other two sites) in a sensitive manner.

Based on the above, the following measures are recommended as indicative development principles to be considered for Site 1:

- Potential retention of mature landscape features within the site may offer opportunities to sympathetically articulate, frame and arrange new built development;
- Retention of areas of open space within the development site;
- New planting to screen development from sensitive visual receptors where appropriate;
- Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure / Landscape strategy for the development of the site;
- Limiting building heights should be proposed for the southern section of the site (so that buildings do not break the ridgeline just to the north of Pwllheli and become visible in views from the south), and;
- Proposals should be developed with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and its key design issues.

Site 2

The following potential issues should be considered:

- The potentially high visual effects of development on sensitive receptors such as residential properties, and users of the public footpath and viewpoint at Y Garn;
- The degree and desirability of settlement extension to the north of Pwllheli;
- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development, though the quality of these would need further investigation, and;
- Access and traffic movements along Allt Salem.

The following mitigation measures should be considered as opportunities to reduce the impact of development at Site 2:

- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development;
- Internal screening and the retention of field boundaries where possible will mitigate potential visual effects from residential properties, but will have little effect on views from Y Garn due to the elevated nature of the viewpoint, and;
- Development could alter the rural character of this site and change the character of the northern edge of Pwllheli, though if green space and screening is maintained / built into the development proposal this effect could be reduced.

Based on the above, the following measures are recommended as indicative development principles to be considered for Site 2:

- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development;
- Retention of areas of open space within the development site;
- New planting to screen development from sensitive visual receptors where appropriate;
- Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure / Landscape strategy for the development of the site;
- Limiting building heights should be proposed for the southern section of the site (so that buildings do not break the ridgeline just to the north of Pwllheli and become visible in views from the south), and;
- Proposals should be developed with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and its key design issues.

Site 3

The following potential issues should be considered:

- The degree and desirability of settlement extension to the east of Pwllheli;
- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development, though the quality of these would need further investigation;
- Access and traffic movements along and off the A499, and;
- Potential for the creation of linear 'ribbon' development along the A499, and a 'blurring' of the currently strongly defined rural / urban transition.

The following mitigation measures should be considered as opportunities to reduce the impact of development at Site 3:

- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development, although the scope for this is more limited than on Sites 1 and 2;
- Internal screening and the retention of field boundaries where possible will mitigate potential visual effects from along the A499 road corridor, and;
- Development could alter the rural character of this site and change the character of the eastern edge of Pwllheli, though if green space and screening is maintained / built into the development proposal (particularly as a green 'buffer' along the A499 boundary) this effect could be reduced.

Based on the above, the following measures are recommended as indicative development principles to be considered for Site 3:

- Potential retention of some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development;

- Retention of areas of open space if possible within the development site;
- New planting (particularly along the A499 boundary) to screen development from the road corridor;
- Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure / Landscape strategy for the development of the site;
- Investigation of potential heritage features, and;
- Proposals should be developed with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and its key design issues.

3.4 Ecology

3.4.1 Baseline

3.4.1.1 Protected Sites

None of the three sites are located within any statutory protected sites including Natura 2000 sites (Special Areas of Conservation, Special Protection Areas), Ramsar sites, Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) or Local Nature Reserves (LNR), nor are any such sites located within 200m of the three sites.

Several Local Wildlife Sites (LWS) are present within the sites and are detailed as follows. Local Wildlife Sites are non-statutory designations identified by the local authority due to that particular area's conservation interests. These sites are afforded protection under policies in Local Development Plans and Unitary Development Plans and the nature conservation interests for which the site was designated are a material consideration in planning conditions. Such sites are also important in the implementation and management of Local Biodiversity Action Plans. Technical Advice Note 5 'Nature Conservation and Planning' (TAN 5) states that developers should avoid harm to nature conservation interests of such sites where possible, and when harm is unavoidable it should be minimised by mitigation measures designed to offset the impact.

Site 1

- The Hen Lllys Local Wildlife Site (LWS) is located within the centre of Site 1 and is designated for semi-improved neutral grassland.
- Gelli, Clogwyn bach & Caeau-gwynion Isa LWS is immediately adjacent to the western boundary of Site 1. This LWS is designated for semi-improved neutral grassland, acid grassland, scrub and broadleaved woodland.
- Garn LWS (designated for acid grassland), is located approximately 170m to the south west.

Site 2

Garn LWS (designated for acid grassland) is located approximately 50m to the south west.

Site 3

- The By Penlon Caernarfon LWS, designated for semi-improved neutral grassland and bracken is within the northern sector of Site 3.
- Nant Stigallt LWS (designated for coniferous woodland, bracken and broadleaved woodland) is immediately adjacent to Site 3, on the opposite (south-eastern) side of the A499.
- Garn LWS (designated for acid grassland), is located approximately 170m to the south west.

3.4.1.2 Protected Species and Habitats

The biodiversity records obtained from the Cofnod database identify West European Hedgehog (1953) and Common Darter (1945) as being present within the 1km grid square which is central to the three sites (SH3735). A bat roost (two bats in a house, species unidentified) was also recorded within the SH3735 grid square in 1993. The biodiversity records available from the specific sites are given below for each site.

In addition to the Cofnod biodiversity records, an extended Phase 1 habitats and species survey was completed by YGC's ecologist (full member of CIEEM) on 22nd October, which considered the presence of European and UK protected species and habitats, plus Section 42 and UKBAP/LBAP species and habitats at and around each site. The survey was limited by the lack of land access but the descriptions of the sites below outline the features were recorded at each site.

The habitats within the three survey areas are very similar being generally adjacent to each other within the wider landscape around Pwllheli and are generally dominated by semi-improved grassland with areas of improved grassland all grazed by sheep or horses at relatively high stocking rates reducing the diversity of the vegetation present. Small areas of rank un-grazed grassland are also present with pockets of scrub and broadleaved woodland while mature trees form avenues and line the minor lanes, which have boundaries primarily comprised of cloddiau and stone walls with a limited number of hedgerows.

See Appendix A.4 for the Extended Phase 1 Habitat Survey Plans and Target Notes.

Site 1

No additional Cofnod records were identified in addition to those mentioned previously.

The extended Phase 1 Habitat survey showed that the site is comprised of semi-improved and improved grassland fields, a wooded river corridor, pockets of mature and semi-mature trees and

scrub. The area provides suitable habitat to support badgers (including a sett) and could potentially support bats, otters, barn owl and reptiles. A wild bee's nest was recorded within a hole in an alder tree adjacent to the existing used graveyard at NGR 237380, 335875 and a pond with potential to support breeding amphibians is present nearby at NGR 237397, 335872.

Site 2

There are previous records of adder from 2006 (SH370353; an adult female at Penrallt) and Toadflax-leaved St. John's Wort from 1993 (SH370353; at Allt Fawr), both approximately 175m south-west of the site.

The extended Phase 1 Habitat survey showed that the survey area is generally composed of semi-improved and improved grassland grazed by sheep. The fields are bordered by cloddiau with the potential to support reptiles and numerous mature ash, sycamores and oaks that are considered to provide low to high potentially suitable habitat for roosting bats.

Extensive areas of scrub are present adjacent to the cloddiau field boundaries, especially around the small number of the central fields which are comprised of rank un-grazed grassland and larger areas of scrub and are considered to provide medium potentially suitable habitat for reptile species such as common lizard, slow worm and grass snake. The mature and semi-mature trees, pockets of scrub and areas of rank grassland throughout the site also provide suitable habitat for a variety of breeding birds.

Numerous evidence of badger activity was recorded at this site with regular crossing points and breaches of boundaries with badger guard hairs.

Site 3

There is a record of polecat from 2005 (SH381355; a road casualty) 65m south of the site.

Site 3 is located within a small riparian valley comprised of improved and semi-improved grassland grazed by sheep with limited areas of marshy grassland and bordered by the stone wall boundary of the A499 into Pwllheli to the southeast.

To the northwest an extensive area of mature broadleaved woodland and dense scrub is present. The habitat is likely to support roosting bats and badger setts and is also considered to provide low to medium potentially suitable habitat for reptile species such as common lizard, slow worm and grass snake within the areas of rank grassland and scrub and the cloddiau boundaries. The areas of mature and semi mature woodland and scrub are also considered to provide suitable habitat for a variety of breeding birds.

3.4.1.3 Statutory Consultees

Consultation was carried out with Natural Resources Wales (NRW) and Gwynedd Council's biodiversity unit with regard to ecological features within the study area. Their responses to the consultation can be viewed in Appendix B and are summarised as follows:

Gwynedd Council: Biodiversity Unit

There are two wildlife sites within the boundaries of the areas; Henllys in Section 2 and By Penlon in Section 3 - both listed as semi improved neutral grassland. There may be other fields which are semi-improved due to lack of intensive farming in recent years, especially in Site 3.

Their specific concerns are summarised as follows:

- Loss of semi improved neutral grassland
- Potential loss of foraging habitat for bats – due to the network of hedgerows with trees.
- Lighting would also have a substantial effect bats in what is currently a rural landscape, poorly lit at night.

Please see Section 3.6.2 for their comments on mature trees within Site 1.

Natural Resources Wales

The potential allocations will need to be assessed in context of the 'Habitat Regulation Assessment' (HRA) of the JLDP in order for the Authority to satisfy themselves that the allocation of the site(s) would not adversely affect the integrity of International and European Protected Sites and the JPPU must be sure beyond reasonable scientific doubt that the proposed allocations will not adversely affect the integrity of a SAC, SPA or Ramsar site.

When assessing allocations the other requirements of the Habitats Directive should also be considered where appropriate. These include:

- provision and management of stepping stone and linear features;
- prevention of incidental capture/killing of European Species;
- protection of European protected species including consideration of deterioration and ensuring compliance of Article 16 in respect of whether the proposal satisfies a listed derogation criterion; and if the two mandatory tests are satisfied.

Land use planning and proposed land use change within Anglesey and Gwynedd needs to adequately consider and audit the relevant provisions of the Birds Directive (as set out in Regulation 9(A) of the 2012 amendments to The Conservation of Habitats and Species Regulations 2010). In the context of the wider countryside, this specifically relates to the upkeep, management and creation of habitat for wild birds. The LPA is reminded of NRW's duty to report on the implementation of this legislation (Regulation 9(B)).

Consideration should also be given to the process of determining whether any of the proposed site allocations are likely to lead to significant environmental effects which have not already been adequately appraised through the SEA of the JLDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy the relevant Test of Soundness.

The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd include otters, bats, great crested newts and water voles. Where a European Protected Species is present, a development may only proceed provided that derogation provisions of Article 16 of the Habitats Directive are satisfied.

Public authorities have a general duty to have regard to conserving biodiversity, as set out in Section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). Therefore, to comply with this the JPPU's decision should take account of possible adverse effects on such interests.

3.4.2 Indicative Development Principles

The following indicative development principles regarding ecological aspects are relevant to all three of the sites under consideration. Where there are site-specific indicative development principles, these are given under each site heading below:

General development principles for all sites

- A preliminary bat assessment should be undertaken during the winter of 2013-2014 of all trees potentially affected by the proposals within each survey area. This will determine an appropriate bat activity survey strategy and plan for the 2014 survey season that should investigate and identify all bat foraging and commuting flight lines that may be affected by the proposals and inform whether a bat licence and mitigation would be required for any proposals to progress.
- A full badger survey should be undertaken in order to identify the locations of all badger crossing points throughout the sites and identify the potential locations of badger setts in order to inform whether a badger disturbance licence is required for the proposals to progress and to determine the location of any mitigation for badgers if required.
- Reptile surveys should be undertaken within the three sites in order to determine the species present and formulate a suitable mitigation strategy for any reptiles present.
- Vegetation clearance and site preparation for the developments should be programmed to avoid the bird nesting season (generally March to September).
- The potential developments should be assessed within the 'Habitats Regulations Assessment' (HRA) of the JLDP to ensure that the allocation of the sites would not adversely affect the integrity of International and European Protected Sites.

- Any land use planning and proposed land use change within Anglesey and Gwynedd needs to consider and audit the relevant provisions of the Birds Directive. In the context of the wider countryside, this specifically relates to the upkeep, management and creation of habitat for wild birds.
- The development of the sites should take into account whether there are likely to be any significant environmental effects not already appraised through the SEA of the JLDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy the relevant Test of Soundness.
- It should be considered whether development will have a negative impact on the conservation status of any protected species. Where a European Protected Species is present, a development may only proceed provided that the derogation provisions of Article 16 of the Habitats Directive are satisfied.
- The development of sites should occur only after it has been shown that species and habitats, set out in Section 40 of the Natural Environment and Rural Communities (NERC) Act (2006) have been regarded. The Phase 1 habitat survey report provides a list of such species and habitats that are likely to be present.

Site specific development principles

Site 1

- The Henllys Local Wildlife Site lies within the centre of this area. There should be no significant adverse effect on the Henllys Local Wildlife Site as part of any development to this area. The Gwynedd Council Biodiversity unit should be consulted regarding any potential impacts on this site.
- The potential presence of Barn owls should be considered and a survey completed to ascertain their presence at the site; particularly any nest sites.
- The alder tree adjacent to the existing disused graveyard containing a wild bee's nest (NGR 237380, 335875) should be avoided and protected during the development of the site. (Phase 1 habitat survey).
- The pond at NGR 237397, 335872 should be retained as a habitat feature and protected during development.

Site 2

- There are no site-specific development principles for this site.

Site 3

- The By Penlon Local Wildlife Site lies within the centre of this area. There should be no significant adverse effect on the By Penlon Local Wildlife Site as part of any development to

this area. The Gwynedd Council Biodiversity unit should be consulted regarding any potential impacts on this site.

As discussed in Section 3.1 the following transport infrastructure improvements may be required in association with the development of Sites 1 to 3, but are located outside of these sites:

- To the north-east of Site 1 the unclassified road, which runs through the middle of Site 1, continues and joins the A499 at SH 38468 36410 is likely to require widening on each side for a length of 900m. This road may also require re-aligning in order to improve the junction to the A499; there is a large length of hedgerow and some trees which would require removal to accommodate this widening. Therefore, this has potential constraints in terms of landscape and ecology e.g. habitat connectivity within the landscape, potential bat roosts, bird nesting habitat and landscape amenity. There may also be protected species within this area.
- There is potential road widening required along the 330m of unclassified road which links the A499 and A497. This widening is located adjacent to the Nant Stigallt Local Wildlife Site, which could potentially be affected. Any development should avoid significant adverse effects to Nant Stigallt Local Wildlife Site. The Gwynedd Council Biodiversity unit should be consulted regarding any potential impacts on this site.

In addition to addressing the constraints associated with development, there is also scope for the following opportunities to be integrated within any development proposals to provide benefits for ecological features as well as the people that would live and work at the sites:

- Retain as many mature trees as possible in order to reduce the amount of habitat potentially used by bats from being removed for the development within all survey areas. Mature trees will also help to create diversity and a focal point in the landscape.
- Install bat boxes on adjacent trees to those that may be felled within all survey areas.
- Retention of the freshwater pond within Site 1 will ensure that breeding amphibians are not excluded and removed from this habitat. The pond will also provide a valuable habitat for many other species and add diversity to the built landscape.
- Creation of new fresh water ponds as part of sustainable drainage systems incorporated within the new developments will provide a drainage function while also creating new habitat for aquatic species and adding visual diversity and a potential educational resource.
- Retention of the disused graveyard as habitat for reptiles and other wildlife within Site 1 and the areas of scrub and rank grassland within Sites 1, 2 and 3 will provide a haven for reptiles displaced by the developments at each site.
- Reptile hibernacula, using materials generated from the developments (such as felled wood) could be built to help support any existing reptile population.

- A barn owl box could be installed to the north of Site 1 or the west of Site 2 to potentially encourage this Schedule 1 bird to nest in the locality and help compensate for potential loss of nesting habitat due to the development of Sites 1 and 2.

3.5 Archaeology and Cultural Heritage

3.5.1 Baseline

3.5.1.1 Designated Sites

A desk study using GIS was completed to identify any designated archaeological and cultural heritage features within or adjacent to each site; including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments (SAMs), World Heritage Sites, Landscapes of Outstanding Historic Interest (LOHIs) and Landscape of Special Historic Interest (LSHIs).

All three sites are fully within the Lleyn and Bardsey Island Landscape of Outstanding Historic Interest. None of the sites are within or adjacent to any of the other features listed, although Pwllheli Conservation Area is approximately 70m to the south at the closest point from Site 2.

Site 1

Pont y Ddwryd is a Grade II listed bridge that spans the Afon Ddwryd located approximately 190m north-west of the site. In addition to this, various listed buildings are located in the town of Pwllheli, approximately 200m to the south.

The Plas Tan yr Allt Tree Preservation order is located approximately 100m south of the site.

Site 2

Pont y Ddwryd is a Grade II listed bridge that spans the Afon Ddwryd located approximately 130m north-west of the site. In addition to this, various listed buildings are located in the town of Pwllheli, approximately 240m to the south-east.

The Plas Tan yr Allt Tree Preservation Order is located approximately 130m south-east of the site.

Site 3

Apart from being within the Lleyn and Bardsey Island LOHI, there are no other designated archaeological or cultural heritage features within or adjacent to the site.

3.5.1.2 Statutory Consultees

Consultation was carried out with Cadw and Gwynedd Archaeological Planning Service (GAPS) regarding archaeological and cultural heritage interests within the study area. GAPS response to the consultation can be viewed in Appendix B and is summarised as follows (note that GAPS were previously consulted on the potential development at the three sites as part of the general JLDP consultation process). Cadw have not yet provided a response.

GAPS have pointed out that there are a number of sites where there are currently no known archaeological restraints. However, the archaeological resource is dynamic with new discoveries being made and reported regularly. It is therefore possible that additional information will come forward during the JLDP process that may affect their advice.

In addition, it should be noted that the nature of curatorial archaeological advice requires comparing the existing evidence base against the potential impact of a given development. Larger scale developments (e.g. those of approximately 3 hectares or more) have the potential to impact on a large area but also have potential to reveal new archaeological information across landscapes where the current knowledge base might be limited. In these circumstances, even where there is limited existing evidence, archaeological evaluation may be required to establish an evidence baseline.

Sites 1 and 2

This area is thought to be the location for the administrative centre (maerdref) of the medieval commote of Afloegion, possibly founded by Llewelyn ap Iorwerth in the 13th century. The nearby remains of the medieval church of St Beuno, earthwork remains (NPRN 43823) identified in a nearby field and place-name evidence (Cae Llan and Hen Llys) all indicate that remains of a medieval settlement probably survive somewhere at Deneio.

Site 3

Though there are no recorded archaeological sites in this area the unimproved nature of the plot means that there is some archaeological potential within it.

3.5.2 Indicative Development Principles

As part of their consultation on the JLDP, GAPS provided the following recommendations for addressing the potential archaeological impacts at the three sites:

Sites 1 and 2

GAPS originally considered that the level of archaeological recommendation should be 'Restraint': May require desk-based assessment prior to planning permission being granted. *No reason for not allocating in JLDP.*

However, as the areas that GAPS were consulted on for this report were larger than those they had been previously consulted on, the recommendation for Sites 1 and 2 could be increased to a 'Fairly Significant Restraint' (will need archaeological evaluation prior to planning permission being granted. *Allocation could be included in JLDP but subject to results of archaeological evaluation*) as it is highly likely further archaeological evaluation will be required in this area. In addition, the area of Site 2 included in this report includes recorded archaeological remains, specifically St Beuno's Church.

Site 3

GAPS considered that the level of archaeological recommendation should be 'Minimal Restraint': Conditions may be placed on planning consent. *No reason for not allocating in JLDP.*

3.6 Arboriculture

3.6.1 Baseline

3.6.1.1 Existing tree stock

A GIS desk study was completed to identify any tree stock within the study areas as registered on the National Inventory of Woodland and Trees. No tree stock was identified within any of the sites. The closest identified tree stocks are approximately 240m north of Site 1 (2.3 ha of broadleaved woodland) and approximately 140m north-east of Site 2 (2.6 ha of broadleaved woodland)

There is no indication within the current Gwynedd UDP (2001 – 2016) or the emerging JLDP that any of the sites are proposed to be used for future tree stocks.

3.6.1.2 Statutory Consultees

Gwynedd Council's Biodiversity Unit made the following comments regarding the protection of mature trees within Site 1:

- Loss of trees in the landscape – there is a Sycamore (NGR 237234, 335618) worthy of TPO protection which could be under threat from root damage should development go ahead. The root protection area for this tree must be calculated so that any future development does not encroach onto this.

- There is a row of mature Ash trees flanking Site 1 on its Western side. The root protection areas for these should also be taken into consideration if this area is to be designated within the JLDP.

3.6.2 Indicative Development Principles

- The root protection area for the Sycamore (NGR 237234, 335618) in Site 1 must be calculated so that any development does not encroach onto this.
- The root protection area for the row of mature Ash trees flanking Site 1 on its Western side must be taken into consideration if this area is to be developed.
- All mature trees to be retained at each site must be considered in relation to BS5837:2012 Trees in relation to design, demolition and construction.

4.0 Conclusions

The following tables present a summary of the information obtained from the initial scoping assessment of each topic in Section 3. Table 4.1 summarises the opportunities and constraints associated with the development of each site and into the long term. Table 4.2 summarises the indicative development principles for Sites 1 to 3 based on the findings of the desk study, site surveys (for transport, ecology and landscape) and consultation with statutory consultees and undertakers.

Table 4.1: Constraints and Opportunities for the Development and Long Term Growth Potential of Sites 1 – 3

Topic	Site 1		Site 2		Site 3	
	Opportunities	Constraints	Opportunities	Constraints	Opportunities	Constraints
<i>Transportation and movement</i>	Three main vehicular access routes.	<p><i>Access from A499 north:</i> Access onto the class 3 road has poor visibility south (towards Pwllheli).</p> <p>From Bryn Crin the geometry of the road worsens as it becomes winding; this significantly affects the forward visibility.</p> <p>No dedicated pedestrian provision.</p> <p><i>Access from A497 via Gaol Street and Allt Salem:</i> Narrow road and conflicts between pedestrians and vehicles are common.</p> <p>Pedestrians would have to walk on the road from the Lley Street Uchaf junction.</p>	As Site 1.	As Site 1.	<p>Good vehicular access from the A499.</p> <p>Potential to reduce congestion in Pwllheli town centre, especially at the A497 / A499 roundabout.</p>	<p>No dedicated pedestrian access.</p> <p>Just outside of 30mph speed limit area.</p>
<i>Utilities capacity</i>	The site is within close proximity to existing gas, electricity, water and telecommunications	The cost associated with connecting the site to the gas infrastructure is estimated to be £114,072; the most	The site is within close proximity to existing gas, electricity, water and telecommunications	The cost associated with connecting the site to the gas infrastructure is estimated to be £37,640; the second most expensive of the	The site is within close proximity to existing gas, electricity, water and telecommunications utilities.	The cost associated with connecting the site to the gas infrastructure is estimated to be £14,895; the least

	utilities.	expensive of the three sites. Existing High Voltage overhead lines may need to be diverted to accommodate the development. Lack of sewerage infrastructure in the vicinity.	utilities.	three sites. Existing High Voltage overhead lines may need to be diverted to accommodate the development. Lack of sewerage infrastructure in the vicinity.		expensive of the three sites.
<i>Landscape and visual character</i>	Site 1 is much larger than Sites 2 and 3 and therefore offers more scope for integrating the same volume of development as could be proposed on the other two sites in a sensitive manner. Retention of mature landscape features within the site may offer opportunities to sympathetically articulate, frame and arrange new built development.	Lleyn and Bardsey Island LOHI A number of areas are already in allocated use, including a cemetery, electricity infrastructure, a public footpath and access roads to a number of properties. Some may be considered detractors to residential development. Public footpath will need to be retained or diverted. Current road network is narrow and widening may be required to facilitate development and future access. The substation and associated power lines	Retention of mature landscape features within the site may offer opportunities to sympathetically articulate, frame and arrange new built development.	Lleyn and Bardsey Island LOHI Access and construction traffic movements along the minor road: Allt Salem. The public footpath to Y Garn presents a physical break. Some stone and brick boundaries would need further investigation to identify the presence of cloddiau.	Retention of mature landscape features within the site may offer opportunities to sympathetically articulate, frame and arrange new built development <i>(the scope for this is more limited than Sites 1 and 2)</i>	Lleyn and Bardsey Island LOHI The level changes, along with the narrow nature of the site and speed of traffic along the A499 present site constraints regarding access and scale of development (especially to the north). There is a spring present, indicating possible drainage issues. The potential presence of cloddiau may involve further investigation and conservation. The private drive to Plas Tirion presents a physical break.

		<p>form a visual detractor.</p> <p>Drainage issues may need further investigation.</p> <p>Access and construction traffic movements along Allt Salem.</p>				<p>The degree and desirability of settlement extension into rural land to the east of Pwllheli.</p> <p>Access and construction traffic movements along and off the A499.</p> <p>Potential for the creation of linear 'ribbon' development along the A499, and a 'blurring' of the strongly defined rural / urban transition</p>
<i>Ecology</i>	<p>Retain mature trees to reduce habitat loss and help retain ecological diversity.</p> <p>Install bat boxes on adjacent trees to those being felled.</p> <p>Retain the pond to provide valuable habitat and retain biodiversity.</p> <p>Create new ponds as sustainable drainage systems.</p> <p>Retain the disused graveyard and the areas of scrub and rank grassland as</p>	<p>Hen Lllys and Gelli, Clogwyn bach & Caeau-gwynion Isa LWS.</p> <p>Protected species: bats, badgers, otters, reptiles, nesting birds.</p> <p>Alder tree with wild bee's nest.</p>	<p>Retain mature trees to reduce habitat loss and help retain ecological diversity.</p> <p>Install bat boxes on adjacent trees to those being felled.</p> <p>Create new ponds as sustainable drainage systems.</p> <p>Retain the areas of scrub and rank grassland as habitat for reptiles displaced by the developments at each site.</p> <p>Construct reptile</p>	<p>Protected species: bats, badgers, otters, reptiles, nesting birds</p>	<p>Retain mature trees to reduce habitat loss and help retain ecological diversity.</p> <p>Install bat boxes on adjacent trees to those being felled.</p> <p>Create new ponds as sustainable drainage systems.</p> <p>Retain the areas of scrub and rank grassland as habitat for reptiles displaced by the developments at each site.</p> <p>Construct reptile hibernacula, using materials generated</p>	<p>By Penlon Caernarfon LWS</p> <p>Nant Stigallt LWS (associated infrastructure improvements)</p>

	<p>habitat for reptiles displaced by the developments at each site.</p> <p>Construct reptile hibernacula, using materials generated from the developments (such as felled wood)</p> <p>Install a barn owl box to the north of Site 1 to potentially encourage this Schedule 1 bird to nest in the locality and help compensate for potential loss of nesting habitat due to the development of Sites 1 and 2.</p>		<p>hibernacula, using materials generated from the developments (such as felled wood)</p> <p>Install a barn owl box to the west of Site 2 to potentially encourage this Schedule 1 bird to nest in the locality and help compensate for potential loss of nesting habitat due to the development of Sites 1 and 2.</p>		<p>from the developments (such as felled wood)</p>	
<p><i>Archaeology and Cultural Heritage</i></p>	<p>Potential to incorporate local historical landscape features, such as cloddiau, within the development.</p> <p>Potential excavation of medieval remains during development of the site.</p>	<p>Lleyn and Bardsey Island LOHI</p> <p>Possible location for administrative centre of the medieval commote of Afloegion. Remains of a medieval settlement probably survive somewhere at Deneio.</p> <p>Archaeological evaluation needed prior to planning</p>	<p>Potential to incorporate local historical landscape features, such as cloddiau, within the development.</p> <p>Potential excavation of medieval remains during development of the site.</p>	<p>Lleyn and Bardsey Island LOHI</p> <p>Possible location for administrative centre of the medieval commote of Afloegion. Remains of a medieval settlement probably survive somewhere at Deneio.</p> <p>Archaeological evaluation needed prior to planning permission being granted.</p>	<p>Potential to incorporate local historical landscape features, such as cloddiau, within the development.</p>	<p>Lleyn and Bardsey Island LOHI</p> <p>Conditions may be placed on planning consent.</p> <p>The unimproved nature of the plot means that there is some archaeological potential within it.</p>

		permission being granted.				
<i>Arboriculture</i>	Mature trees within the site could be retained to provide visual diversity within the development and habitat for other species.	Sycamore at NGR 237234, 335618 Row of mature Ash trees along Western boundary	Mature trees within the site could be retained to provide visual diversity within the development and habitat for other species.			
<i>Miscellaneous</i>		If the cemetery was to be developed, NRW would require a site investigation and risk assessment - NRW are likely to object to the inclusion of Site 1 if this information is not presented by the deposit stage. NRW would require information on the local water features and a hydrogeological impact appraisal to support the re-opening or extension of the quarries.				

Table 4.2: Indicative Development Principles for Sites 1 – 3

Topic	Site 1	Site 2	Site 3
Transportation and movement	<p>Improve the Class 3 road from the A499 junction with Bryn Tirion / Yoke House to Site 1; to include improvement of the junction with the A499 and widening of the Class 3 road to a minimum 5.5m.</p> <p>Create a new access road from the A499 (north of Pwllheli) that ends next to Coleg Meirion Dwyfor.</p> <p>Create a college bus link.</p> <p>Widen the carriageway at Allt Salem by using the available land on the west and create a footway link on the right hand side. The start of the proposed footway would link to Troed yr Allt and the footway access to the college.</p> <p>Junction visibility improvements from the Llannor direction.</p>	As Site 1.	<p>Extend the footway provision and the existing 30mph limit from the A499 south.</p> <p>Extend the footway and create a 40mph limit from the A499 north.</p> <p>Widen and improve the horizontal and vertical alignments of Lôn Nant Stigallt.</p>
Utilities capacity	<p>Confirm use of site and estimated demand for utilities.</p> <p>Investigate costs associated with connecting to relevant utilities to provide services required.</p>	As Site 2.	As Site 3.
Landscape and visual character	<p>Development must consider adverse effects on the Lley and Bardsey Island LOHI.</p> <p>Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns.</p>	<p>Development must consider adverse effects on the Lley and Bardsey Island LOHI (NRW comment)</p> <p>Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns.</p>	<p>Development must consider adverse effects on the Lley and Bardsey Island LOHI (NRW comment)</p> <p>Proposals for development within LCA 8 should consider existing settlement pattern, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns.</p>

	<p>Proposals for development around settlement edges within LCA 10 should reflect the character of existing settlement, making use of landform and vegetation patterns to mitigate impacts and reflect local patterns. Developments should integrate into the vernacular of the area. Impacts on the wider landscape should be considered.</p> <p>Consider the potentially high visual effects of development on sensitive receptors such as residential properties within and around the site boundary, and users of the viewpoint at Y Garn.</p> <p>Retain areas of open space within the site.</p> <p>Retaining some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development.</p> <p>Maintain/incorporate green space and screening into the development to reduce the adverse effect.</p> <p>Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure/Landscape strategy for the development of the site.</p> <p>Provide new planting to screen development from sensitive visual receptors where appropriate.</p> <p>Internal screening and the retention of field boundaries where possible will mitigate visual effects from residential properties, but will have little effect on views from Y</p>	<p>Consider the potentially high visual effects of development on sensitive receptors such as residential properties, and users of the public footpath and viewpoint at Y Garn.</p> <p>Retain areas of open space within the site</p> <p>Retaining some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development.</p> <p>Maintain/incorporate green space and screening into the development to reduce the adverse effect.</p> <p>Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure/Landscape strategy for the development of the site.</p> <p>Provide new planting to screen development from sensitive visual receptors where appropriate.</p> <p>Internal screening and the retention of field boundaries where possible will mitigate visual effects from residential properties, but will have little effect on views from Y Garn due to the elevated nature of the viewpoint.</p> <p>Limit building heights in the southern section so that buildings do not break the ridgeline to the north of Pwllheli and become visible in views from the south.</p> <p>Develop proposals with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and</p>	<p>Retain areas of open space within the site.</p> <p>Retaining some mature landscape features around the site may offer some opportunities to sympathetically articulate, frame and arrange new built development (the scope for this is more limited than Sites 1 and 2).</p> <p>Retention of existing site vegetation and open space and new planting should form part of a Green Infrastructure/Landscape strategy for the development of the site</p> <p>Provide new planting (particularly along the A499 boundary) to screen development from the road corridor.</p> <p>Internal screening and the retention of field boundaries where possible will mitigate visual effects from along the A499 road corridor.</p> <p>Maintain/incorporate green space and screening into the development (particularly as a green 'buffer' along the A499 boundary) to reduce the adverse effect.</p> <p>Investigate potential heritage features e.g. cloddiau and consider whether these can be incorporated within the development.</p> <p>Develop proposals with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and its key design issues.</p>
--	---	--	--

	<p>Garn due to the elevated nature of the viewpoint.</p> <p>Limit building heights in the southern section so that buildings do not break the ridgeline to the north of Pwllheli and become visible in views from the south.</p> <p>Develop proposals with reference to the Landscape Character Supplementary Planning Guidance (November 2009) and its key design issues.</p>	its key design issues.	
Ecology	<p>Development should avoid harming the Hen Lllys and Gelli, Clogwyn bach & Caeau-gwynion Isa LWS (UDP, Policy B17)</p> <p>Development should avoid encroaching into Garn LWS approximately 170m to the south-west (UDP, Policy B17).</p> <p>Consider the potential presence of Barn owls and complete a survey to ascertain their presence at the site; particularly any nest sites.</p> <p>The alder tree adjacent to the existing disused graveyard containing a wild bee's nest (NGR 237380, 335875) should be avoided and protected during the development of the site.</p> <p>The pond at NGR 237397, 335872 should be retained as a habitat feature and protected during development.</p> <p>A preliminary bat assessment should be undertaken during the winter of 2013-2014 of all trees potentially affected to determine an appropriate bat activity survey strategy and plan for the 2014 survey season.</p>	<p>Development should avoid encroaching into Garn LWS approximately 50m to the south-west (UDP, Policy B17).</p> <p>A preliminary bat assessment should be undertaken during the winter of 2013-2014 of all trees potentially affected to determine an appropriate bat activity survey strategy and plan for the 2014 survey season.</p> <p>A badger survey should be undertaken to inform whether a badger disturbance licence is required.</p> <p>Reptile surveys are required to determine the species present and formulate a suitable mitigation strategy.</p> <p>Vegetation clearance and site preparation should be programmed to avoid the bird nesting season (generally March to September).</p> <p>The development should be assessed within the 'Habitats Regulations Assessment' of the JLDP to ensure that the allocation of the site would not adversely</p>	<p>Development should avoid harming the By Penlon Caernarfon LWS (UDP, Policy B17)</p> <p>Development should avoid encroaching into Garn LWS approximately 170m to the south-west (UDP, Policy B17).</p> <p>Development associated with infrastructure improvements in the vicinity of Site 3 should avoid harming the Nant Stigallt LWS (UDP, Policy B17)</p> <p>A preliminary bat assessment should be undertaken during the winter of 2013-2014 of all trees potentially affected to determine an appropriate bat activity survey strategy and plan for the 2014 survey season.</p> <p>A badger survey should be undertaken to inform whether a badger disturbance licence is required.</p> <p>Reptile surveys are required to determine the species present and formulate a suitable mitigation strategy.</p> <p>Vegetation clearance and site preparation</p>

	<p>A badger survey should be undertaken to inform whether a badger disturbance licence is required.</p> <p>Reptile surveys are required to determine the species present and formulate a suitable mitigation strategy.</p> <p>Vegetation clearance and site preparation should be programmed to avoid the bird nesting season (generally March to September).</p> <p>The development should be assessed within the 'Habitats Regulations Assessment' of the JLDP to ensure that the allocation of the site would not adversely affect the integrity of International and European Protected Sites</p> <p>Any land use planning and proposed land use change needs to consider and audit the relevant provisions of the Birds Directive; particularly the upkeep, management and creation of habitat for wild birds.</p> <p>The development of the site should consider whether there are likely to be any significant environmental effects not already appraised through the SEA of the JLDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy a Test of Soundness.</p> <p>Where a European Protected Species is present, a development may only proceed provided that the derogation provisions of Article 16 of the Habitats Directive are</p>	<p>affect the integrity of International and European Protected Sites</p> <p>Any land use planning and proposed land use change needs to consider and audit the relevant provisions of the Birds Directive; particularly the upkeep, management and creation of habitat for wild birds.</p> <p>The development of the site should consider whether there are likely to be any significant environmental effects not already appraised through the SEA of the JLDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy a Test of Soundness.</p> <p>Where a European Protected Species is present, a development may only proceed provided that the derogation provisions of Article 16 of the Habitats Directive are satisfied.</p> <p>The development of the site must consider the species and habitats in section 40 of the NERC Act (2006).</p>	<p>should be programmed to avoid the bird nesting season (generally March to September).</p> <p>The development should be assessed within the 'Habitats Regulations Assessment' of the JLDP to ensure that the allocation of the site would not adversely affect the integrity of International and European Protected Sites</p> <p>Any land use planning and proposed land use change needs to consider and audit the relevant provisions of the Birds Directive; particularly the upkeep, management and creation of habitat for wild birds.</p> <p>The development of the site should consider whether there are likely to be any significant environmental effects not already appraised through the SEA of the JLDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy a Test of Soundness.</p> <p>Where a European Protected Species is present, a development may only proceed provided that the derogation provisions of Article 16 of the Habitats Directive are satisfied.</p> <p>The development of the site must consider the species and habitats in section 40 of the NERC Act (2006).</p>
--	--	---	--

	<p>satisfied.</p> <p>The development of the site must consider the species and habitats in section 40 of the NERC Act (2006).</p>		
Archaeology and Cultural Heritage	Development must have no significant harm on the Lleyn and Bardsey Island LOHI (UDP, Policy B12)	Development must have no significant harm on the Lleyn and Bardsey Island LOHI (UDP, Policy B12)	Development must have no significant harm on the Lleyn and Bardsey Island LOHI (UDP, Policy B12)
Arboriculture	<p>A Sycamore (NGR 237234, 335618) worthy of TPO protection is under threat from root damage should development occur. The root protection area must be calculated so that any future development does not encroach onto this.</p> <p>Row of mature ash trees along the Western side. The root protection areas should be taken into consideration if this area is to be designated within the JLDP.</p> <p>All mature trees to be retained must be considered in relation to BS5837:2012.</p>	All mature trees to be retained must be considered in relation to BS5837:2012.	All mature trees to be retained must be considered in relation to BS5837:2012.

Appendix A: Plans and Figures

A.1: Transport Appraisal plans

A.2: Utilities plans

A.3: Landscape Appraisal Plans

A.4: Ecology Appraisal Plan

Appendix A.1: Transport Appraisal Plans

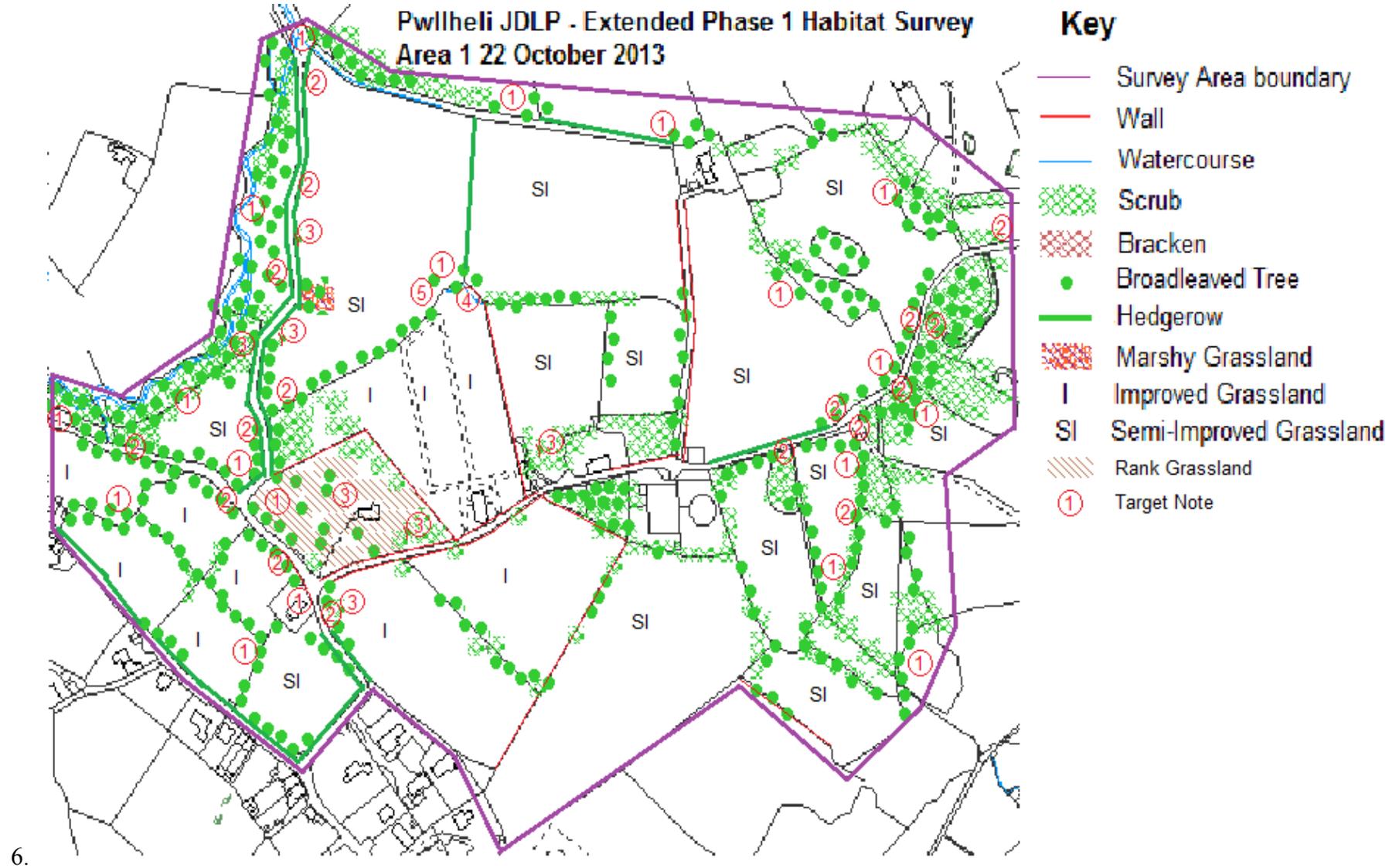
Appendix A.2: Utilities plans

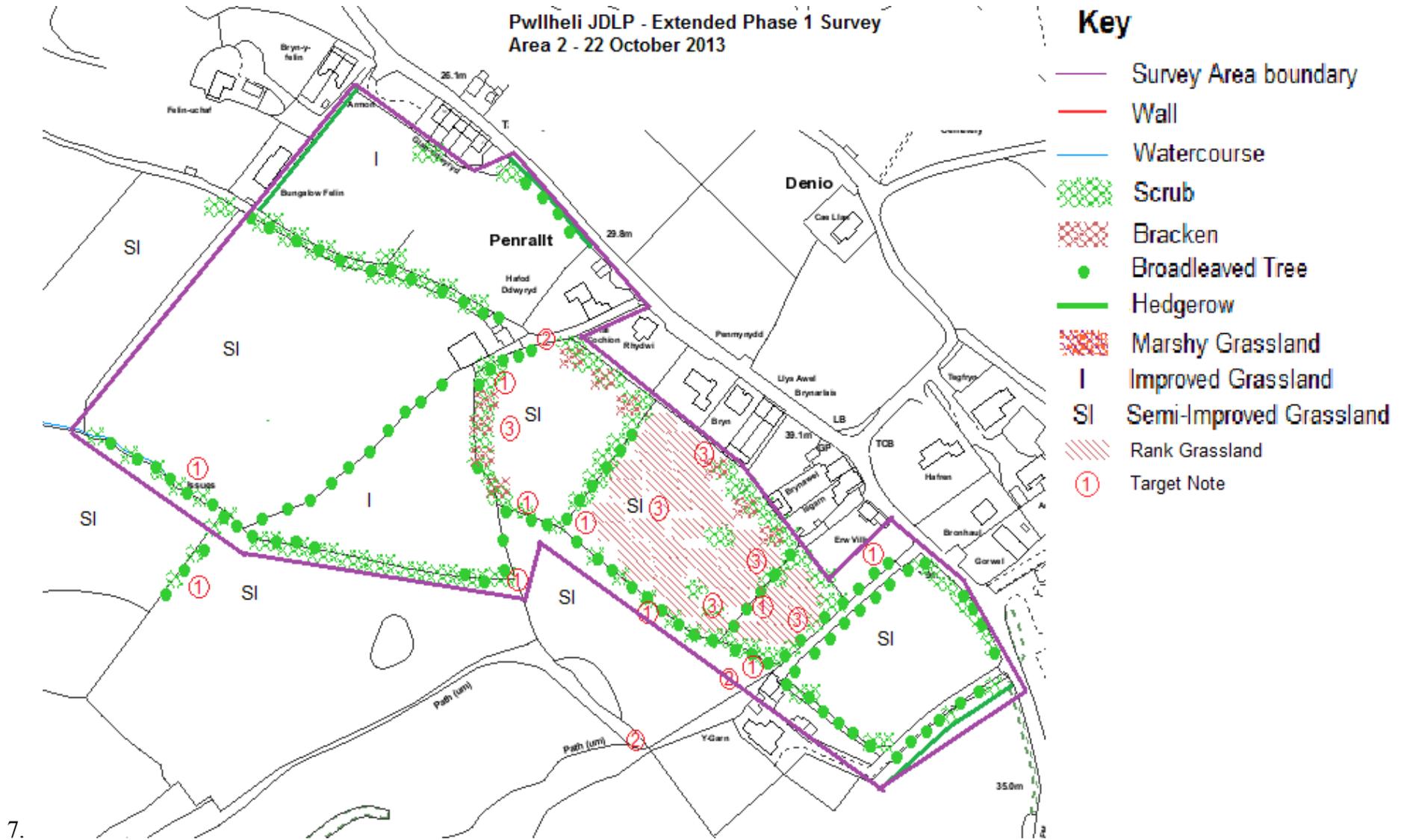
Appendix A.3: Landscape Appraisal Plans

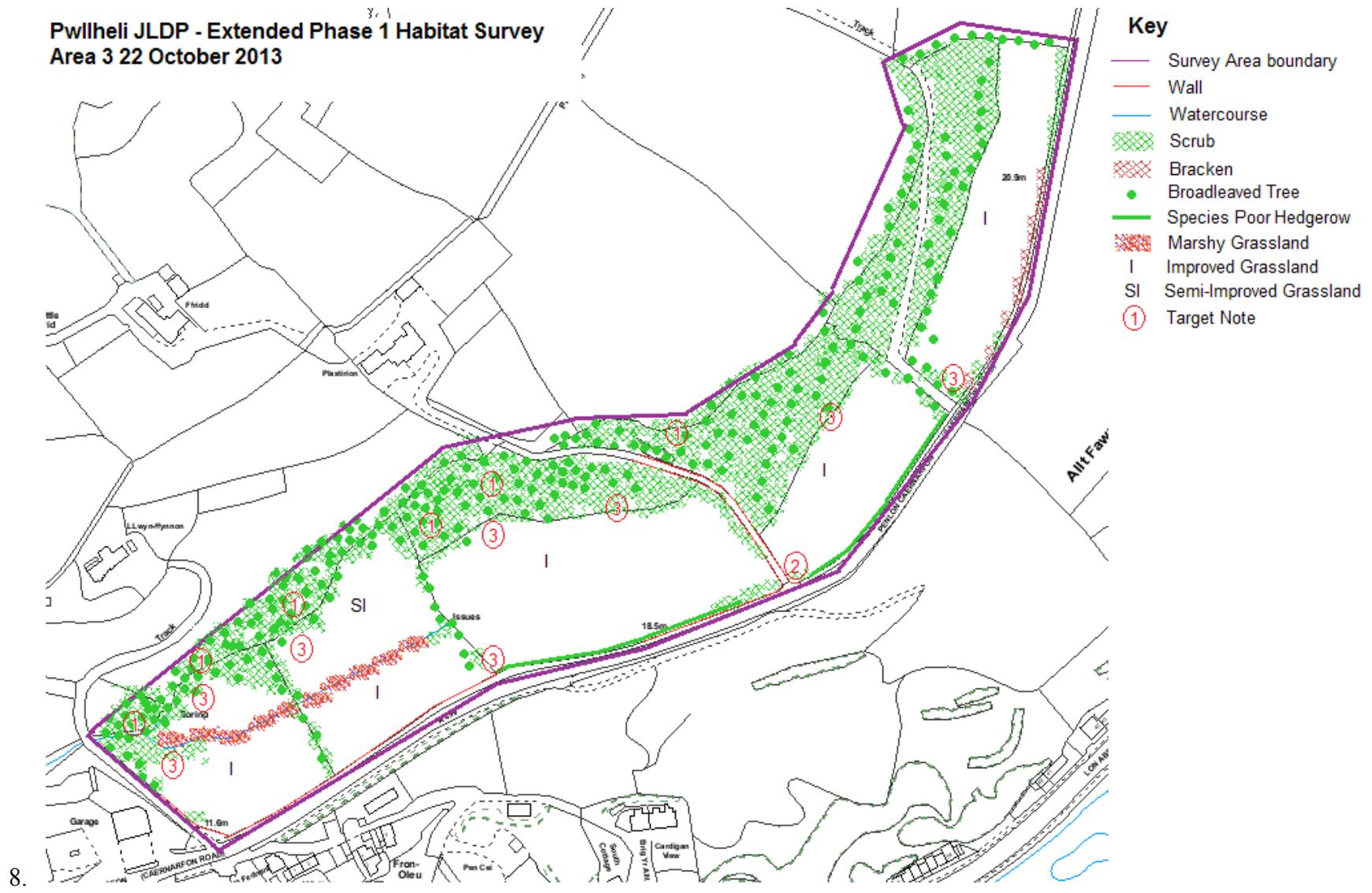
Appendix A.4: Extended Phase 1 Habitat Survey Plans and Target Notes

Target Notes

1. Mature broadleaved trees with low to high bat roost potential
2. Badger activity, including feeding scrapes and boundary breaches with badger guard hairs
3. Potential Reptile habitat
4. Pond with potential for breeding amphibians
5. Wild bees nest in mature alder.







Appendix B: Consultation Responses

Gwynedd Archaeological Planning Service

Chris,

Attached is a snapshot of the areas we were consulted on around Pwllheli – hope this is useful. I have also attached a table explaining the terms used when responding to JLDP allocations (i.e. Restraint, etc.).

My comments re the three areas you have consulted me on are as follows:

1 & 2

Restraint

This area is thought to be the location for the administrative centre (maerdref) of the medieval commote of Afloegion, possibly founded by Llewelyn ap Iorwerth in the 13th century. The nearby remains of the medieval church of St Beuno, earthwork remains (NPRN 43823) identified in a nearby field and place name evidence (Cae Llan and Hen Llys) all indicate that remains of a medieval settlement probably survive somewhere at Deneio.

3

Minimal restraint

Though there are no recorded sites in this area the unimproved nature of the plot means that there is some archaeological potential within this area

However, I have included a covering letter within my correspondence with the JPPU which explains the archaeological decision making process further:

There are a number of sites where there are currently no known archaeological restraints. However, the archaeological resource is dynamic with new discoveries being made and reported regularly (over 2000 new records are added to the regional Historic Environment Record annually). It is therefore possible that additional information will come forward during the JLDP process that may affect this advice.

It should be noted that the nature of curatorial archaeological advice requires comparing the existing evidence base against the potential impact of a given development. Larger scale developments (e.g. those of approximately 3 hectares or more) have the potential to impact on a large area but also have potential to reveal new archaeological information across landscapes where the current knowledge base might be limited. In these circumstances, even where there is

limited existing evidence, archaeological evaluation may be required to establish an evidence baseline.

Given the areas you have shown in your consultation appear larger than those I have been consulted on I would suggest that the Restraint identified in areas 1 & 2 could be increased to a Fairly Significant Restraint as it is highly likely further archaeological evaluation will be required in this area. In addition, area 2 as marked on your plan actually includes recorded archaeological remains, specifically St Beuno's Church is within this area.

I can provide more detailed comment if required and am happy to advise you further if you want to get in touch.

All the best,

Ashley

Ashley Batten

Uwch Archaeolegydd Cynllunio – Senior Planning Archaeologist

Gwasanaeth Cynllunio Archaeolegol Gwynedd - Gwynedd Archaeological Planning Service

Craig Beuno

Garth Road

Bangor

LL57 2RT

Tel. 01248 370926

Mob. 07920264232

Fax. 01248 370925

GAPS is the autonomous planning service of Ymddiriedolaeth Archaeolegol Gwynedd Archaeological Trust <http://www.heneb.co.uk/gaps.html>

Gwynedd Archaeological Planning Service Responses to JLDP Candidate Sites

Archaeological Restraint

Archaeological Recommendation

None known

No reason for not allocating in JLDP

Minimal Restraint

Conditions may be placed on planning consent.
No reason for not allocating in JLDP

Restraint

May require desk-based assessment prior to planning permission being granted. No reason for not allocating in JLDP

Fairly Significant Restraint

Will need archaeological evaluation prior to planning permission being granted. Allocation could be included in JLDP but subject to results of archaeological evaluation.

Significant Restraint

Extensive archaeological work will be required prior to any positive determination of any planning application. If this site was to be included in JLDP archaeological evaluation would be required prior to its inclusion.

Major Restraint

The area should not be allocated in JLDP

Gwynedd Council: Biodiversity Unit

From: Jones Rhys (Rh-CTGC)
Sent: 04 November 2013 15:33
To: Jones Chris (YMG)
Subject: RE: Pwllheli JLDP potential development sites: consultation

Hi Chris

I had a chance to visit the site today. One thing that struck me is how large the cemetery is - it takes up a lot of the section 2 marked on the map. I'm sure you noticed! Not much to add to my initial comments regarding bats, hedgerows and unimproved pasture. I admit that all the fields I looked at appeared to be improved, although I did not enter them to have a proper look. The fields in section 3 still appeared to be quite wet with a couple of nice thick scrubby hedges crossing it. There's also some nice scrub flanking the fields on the northern side. I'm not sure whether this area is within the development proposed areas.

The large sycamore I mentioned is at
237234,335618

I would suggest that the root protection area for this tree is worked out and that any future development area does not encroach onto this. This should avoid issues in the future if the number of houses allocated matches the actual area available.

There is a row of nice mature ashes flanking area 1 on its Western side. I would suggest that root protection areas are also taken into consideration if this area was to be designated as well.

Let me know if you have any questions or need any clarification.

Hwyl

Rhys

Rhys Jones

Uwch Swyddog Bioamrywiaeth – Senior Biodiversity Officer

Uned Bioamrywiaeth - Biodiversity Unit

Cyngor Gwynedd

Caernarfon

From: Jones Rhys (Rh-CTGC)
Sent: 30 October 2013 10:22
To: Jones Chris (YMG)
Subject: FW: Pwllheli JLDP potential development sites: consultation

Follow Up Flag: Follow up
Flag Status: Red

Attachments: image001.gif

Hi Chris

Apologies for this late response to your enquiry.

Most of the area appears to be small fields of improved or semi-improved grassland, surrounded by hedgerows with trees, some mature.

There are two wildlife sites within the boundaries of the areas you have shown:

Henllys in section 2 and By Penlon in section 3, both listed as semi improved neutral grassland. As I mentioned there may be other fields which are semi-improved due to lack of intensive farming in recent years.

Our concerns would be

Loss of semi improved neutral grassland

Potential loss of foraging habitat for bats – the network of hedgerows with trees seems ideal. Lighting would also have a substantial effect bats in what is currently a rural landscape, poorly lit at night.

Loss of trees in the landscape – there is one particular tree, a sycamore worthy of TPO protection which could be under threat from root damage should development go ahead.

I've not had time to visit the area yet but will do so next time I'm in Pwllheli, so I may get back to you with further comments -if it's not too late.

Please get in touch if you have any questions Diolch Rhys

Rhys Jones

Uwch Swyddog Bioamrywiaeth – Senior Biodiversity Officer

Uned Bioamrywiaeth - Biodiversity Unit

Cyngor Gwynedd

Caernarfon

LL55 1SH

(01286) 679782 ext. 2782

Natural Resources Wales



Mr Chris Jones
Senior Environment Officer
Ymgynghoriaeth Gwynedd Consultancy
Stryd Y Jel
Shirehall Street
Caernarfon
LL55 1SH

Our ref: NT/2013/115116/01-L01
Your ref: Q3OCT13013
Date: 1st November 2013

Dear Mr Jones,

PWLLHELI JLDP POTENTIAL DEVELOPMENT SITES: CONSULTATION 3 SITES IN PWLLHELI

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales concerning the above, which was received on 10th October 2013.

Natural Resources Wales brings together the work of the Countryside Council for Wales, Environment Agency Wales and Forestry Commission Wales, as well as some functions of Welsh Government. Our purpose is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.

Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent strategy consultations or planning applications. At the time of any other consultation there may be new information available which we will need to take into account in making a formal response. Our comments on the three areas for possible inclusion within the JLDP are as follows:

Land Contamination and Groundwater

The three areas are underlain by a mixture of Secondary A and Secondary B aquifers types. There are no source protection zones within the Pwllheli area.

The three sites appear to be Greenfield sites with no prior development that may have contaminated the soil and groundwater. We assume that the cemetery will remain a cemetery with no planned redevelopment. However, if the cemetery was to be developed, we would require site investigation and risk assessment - we are likely to object to the inclusion of Area 1 if this information is not presented by the deposit stage.

As regards the quarry we would require information on the local water features and a hydrogeological impact appraisal to support the re-opening or extension of the

www.cyfoethnaturiolcymru.gov.uk www.naturalresourceswales.gov.uk

Llwyn Brain, Ffordd Penlan, Parc Menai, Bangor, LL57 4DE

Croesewir goheblaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

quarries.

Legislative context – Protected Sites and Protected Species

Regulations 9(1) and 9(5) of the Conservation of Habitats and Species Regulations 2010 (as amended) requires public bodies in exercise of their functions, to have regard to and to secure compliance with the provisions of the 1992 'Habitats' Directive (92/43/EEC) and the 2009 'Birds' Directive ([2009/147/EC](#)) so far that they might be affected by those functions.

The potential allocations will need to be assessed in context of the 'Habitat Regulation Assessment' (HRA) of the LDP in order for the Authority to satisfy themselves that the allocation of the site(s) would not adversely affect the integrity of International and European Protected Sites.

We remind you that, as a competent authority for the purposes of the 2010 Regulations, your authority must not normally agree to include any of the proposed allocations and the plan unless you are sure beyond reasonable scientific doubt that any of the proposed allocations will not adversely affect the integrity of a SAC, SPA or RAMSAR site.

When assessing allocations the other requirements of the Habitats Directive should also be considered where appropriate. This includes provision and management of stepping stone and linear features; prevention of incidental capture/killing of European Species; protection of European protected species including consideration of deterioration and ensuring compliance of Article 16 in respect of whether the proposal satisfies a listed derogation criterion; and if the two mandatory tests are satisfied. Article 16 derogation is discussed in further detail in Section 2 below.

We consider that land use planning and proposed land use change within Anglesey and Gwynedd needs to adequately consider and audit the relevant provisions of the Birds Directive (as set out in Regulation 9(A) of the 2012 amendments to The Conservation of Habitats and Species Regulations 2010). In the context of the wider countryside, this specifically relates to the upkeep, management and creation of habitat for wild birds. The LPA is reminded of NRW's duty to report on the implementation of this legislation (Regulation 9(B)).

Consideration should also be given to the process of determining whether any of the proposed site allocations are likely to lead to significant environmental effects which have not already been adequately appraised through the SEA of the LDP. If it is considered that they will lead to such changes, the relevant appraisal should be undertaken to satisfy the relevant Test of Soundness.

Protected Landscapes

All of the potential sites are located within the Llyn ac Ynys Enlli Registered Landscape of Historic Interest.

While this is not a statutory designation, Chapter 6 of Planning Policy Wales identifies that it should be a material consideration in the planning process and must be given due regard.

Protected Species

The possible impact of development on the favourable conservation status of protected species needs further consideration. Species present in Gwynedd include otters, bats, great crested newts and water voles.

We assume that none of the proposed candidate sites have been subject to detailed ecological surveys.

Where a European Protected Species is present, a development may only proceed provided that derogation provisions of Article 16 of the Habitats Directive are satisfied. The relevant Article 16 derogation in respect of development is:

"that the proposal is for preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"

Furthermore, two statutory tests also need to be complied with:

"that there are no satisfactory alternative; and

"that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range".

The detail of the allocations does not address issues in respect of incidental capture/killing of European Species (see Regulation 51 of the Conservation of Habitats and Species Regulations 2010/Article 15 of the Habitats Directive). Any allocations that have implications for European Annex IV Species must include restrictions that prevent or reduce incidental capture/killing.

5. Natural Environment and Rural Communities (NERC) Act (2006)

Please note that we have not considered possible effects on all local or regional interests. Therefore, you should not rule out the possibility of adverse effects on such interests, which would be relevant to your Authority's general duty to have regard to conserving biodiversity, as set out in section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). This advice includes any consideration of the planned provision of "linear" and "stepping stone" habitats as defined in Article 10 of the Habitats Directive.

To comply with your authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests. We recommend that you seek further advice from your authority's internal ecological adviser and/or third sector nature conservation

organisations such as the local wildlife trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species (www.biodiversitywales.org.uk).

6. Annex 1 Habitat and Wildlife Sites

We advise that you consult your ecologist and Cofnod in respect of the potential presence of any Annex 1 habitats within the boundaries of any of the proposed allocations.

We thank you for the opportunity to provide comments on the suitability of the proposed site allocations. Should you wish to arrange a meeting to discuss our comments further, or wish clarification on any of the matters raised, please do not hesitate to contact me.

Yn gywir / Yours' faithfully,



Mr. GARETH THOMAS

Swyddog Cyswllt Cynllunio / Planning Liaison Officer

Ebost/Email: Gareth.Thomas@cyfoethnaturiolcymru.gov.uk

Deialu uniongyrchol/Direct dial 01248 48 4075

cc: Angharad Crump