

<b>PLANNING COMMITTEE</b>	<b>DATE: 26/02/2024</b>
<b>ASSISTANT HEAD OF DEPARTMENT'S REPORT</b>	

**Number: 6**

**Application No: C21/0861/23/LL**

**Date of  
Registration: 29/10/2021**

**Application  
Type: Full**

**Community: Llanrug**

**Ward: Llanrug**

**Proposal: Application for remodelling and extending the existing hotel and spa together with siting 39 holiday lodges, the provision of an outdoor activity centre zone, a reception and biomass plant unit together with a temporary road for construction traffic, parking and landscaping.**

**Location: Seiont Manor Hotel, Llanrug, Caernarfon, Gwynedd, LL55 2AQ**

**Summary of the  
Recommendation: APPROVE WITH CONDITIONS**

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## 1. Description:

1.1 This is a full application for the redevelopment of the disused *Seiont Manor*/Llwyn y Brain hotel site on the western edge of the village of Llanrug and in open countryside by redesigning and extending the existing hotel and facilities together with siting 39 holiday lodges on land north of the applicant-owned hotel. The application has been submitted on the basis of the following developments:-

- Extensions and remodelling of existing hotel structure including: - lounge bar and restaurant with accompanying terrace; provision of 28 additional bedrooms of 32m<sup>2</sup>; provision of 29 additional bedrooms size 28 to 35m<sup>2</sup> on two floors; provision of spa facilities on the northern wing of the extended hotel and provision of 4 bedrooms within the roof (a total of 61 bedrooms compared to the existing 33-bedroom provision).
- Provision of 39 one-storey 3-bedroom holiday units in the form of lodges together with 2 parking spaces for each lodge. The lodges are located within 3 zones north of the existing hotel and served by private single driveways. Please note that a revised plan has been submitted following the Local Planning Authority's concerns about the visual impact of some of the lodges located on top of the hillock in zone 1.
- Provision of 2 laybys/passing places along the driveway currently serving the hotel.
- Provision of 43 additional parking spaces parallel to the hotel.
- Creation of an open play/amenity area immediately north of the hotel.
- Provision of landscaping areas within and around the application site.
- Erection of a reception for the lodges, an activity centre together with a play equipment point.
- Erection of a biomass plant unit opposite the hotel's main entrance.

1.2 The site is located in open countryside to the west of the settlement of Llanrug and within the PSR4 Landscape Character Area (Caernarfon Coast and Plateau). The majority of the land subject to the application is within Agricultural Land Classification (ALC) 3a. The Glanrafon Wildlife Site lies north of the hotel and on the northern edge of the lodges site, and the north-western part of the site where some of the lodges will be located is included within the Dinorwig Landscape of Outstanding Historic Interest designation by CADW.

1.3 The site is served by an existing private driveway which connects the site to the class 1 county road, Llanberis Road, southwards. Please note that a small section of private driveway near the hotel and which runs northwards parallel with zone 2 and 3 (lodge area) is a public footpath identified as public footpath No. 31 Llanrug.

1.4 Plasty Llwyn y Brain, which is a grade II listed building, is located to the south-west of the hotel itself but this particular property is not part of this current application although it is intended to refurbish and alter the mansion in future which would be the subject of a separate listed-building application and planning application.

1.5 Commercial properties along with residential dwellings are located around the site, including Glanrafon Farm (351m north); Glan Seiont (267m west); Sŵn y Gwynt (507m south-west); Challoner Caravan Park (260m south-east) and Bryn Afon (303m east).

1.6 In support of the application, the following documents were submitted:- Design, Access and Planning Statement; Design Strategy Statement; Transport Statement; Welsh Language Statement; Landscape and Visual Appraisal; Arboricultural Survey to requirements BS 5837;

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PAC Report; Ecological Impact Assessment; Ecological Summary Statement and Addendum; Bat Survey; Landscape and Environmental Management Plan; Screening Report for Potential Impact on Glynllifon Special Area of Conservation together with the SuDS Sustainable Drainage Strategy Report.

- 1.7 The development is described as a Tourism and Leisure project under Schedule 2, Class 12 (c) Regulation 2(1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 which requires the application to be screened. To this end, the application has been screened but taking into account its scale, nature and mitigation measures, an Environmental Impact Assessment will not need to be submitted with this current application. It was confirmed that the applicant had undertaken a pre-application consultation in accordance with the requirements of Article 1 of the Town and Country Planning (Development Management Procedure) (Wales)(Amendment) Act 2016 as the proposal was defined as a *major development*.

## 2. Relevant Policies:

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that applications should be determined in accordance with the Development Plan, unless a material consideration in respect of planning indicates otherwise. Planning considerations include the National Planning Policy, and the Local Development Plan.

- 2.2 The Well-being of Future Generations (Wales) Act 2015 places a duty on the Council to undertake reasonable steps in exercising its functions to meet the 7 well-being objectives within the Act. This report has been prepared having regard to the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In formulating the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their needs.

- 2.3 **Gwynedd and Anglesey Joint Local Development Plan (LDP) 2011-2026 adopted 31 July 2017: -**

ISA 1: Infrastructure provision

PS 2: Infrastructure and developer contributions

PCYFF 1: Development boundaries

PCYFF 2: Development criteria

PCYFF 3 : Design and place shaping

PCYFF 4: Design and landscaping

PCYFF 5: Carbon management

PCYFF 6: Water conservation

PS 5: Sustainable development

PS 6: Mitigating and adapting to the effects of climate change

AMG 3: Protecting and enhancing features and qualities that are distinctive to the local landscape character

AMG 5: Local biodiversity conservation

PS 19: Conserving and where appropriate enhancing the natural environment

PS 20: Preserving and where appropriate enhancing heritage assets

AT1 : Conservation areas, world heritage sites and registered landscapes, parks and gardens

PS 1: Welsh Language and Culture

TRA 2: Parking standards

TRA 4 : Managing transport impacts

PS 14: Visitor economy

TWR 2: Holiday accommodation

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TWR 3 : Static caravan and chalet sites and permanent alternative camping accommodation  
 PS 20: Preserving and where appropriate enhancing heritage assets  
 Supplementary Planning Guidance (SPG): Maintaining and Creating Distinctive and Sustainable Communities as well as SPG: Tourism Facilities and Accommodation.

## 2.4 National Policies:

Future Wales: The National Plan 2040.

Planning Policy Wales (Edition 12 – February 2024).

Technical Advice Note (TAN) 5: Nature Conservation and Planning.

TAN 12: Design:

TAN 13: Tourism.

TAN 18: Transport.

TAN 20: Planning and the Welsh Language.

TAN 23: Economic Development.

TAN 24: Historic Environment.

## 3. Relevant planning history:

3.1 Pre-application enquiry No. Y20/0442 extension of the number of bedrooms from 28 to 63; siting of 50 holiday lodges; provision of 10-bedroom accommodation for staff; development of 45 retirement flats; development of conference and wedding pavilion; new biomass equipment and outdoor activity area. The Local Planning Authority has responded by stating that consideration will need to be given to visual amenities; residential amenities; local biodiversity conservation; road safety; Welsh language; accessibility and sustainability along with heritage assets. Concern over the scale of the proposal.

3.2 Application number C07A/0730/23/LL for a conservatory as an extension to a bar permitted on 28.11.07.

## 4. Consultations:

Community/Town Council: At a meeting of Llanrug Community Council held on 16 November 2021, the council resolved to oppose the application for the following reasons:-

a) The council is concerned about the number of cars / traffic going to Seiont Manor because the entrance is narrow and also the amount of traffic that would come out of Seiont Manor wanting to join the main road either towards Llanberis or Caernarfon.

b) The council considers that the development of the hotel and 39 lodges is unsuitable for the area due to employment and it is felt that there are not enough local people to be employed

c) There is concern about the impact of the development on the Welsh language, and the environmental impact

d) The council considers that the development is too large, and an unnecessary addition to an area where many similar holiday destinations already exist. The self-

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sustaining nature of the scheme in terms of having a shop there along with leisure resources means very little benefit would come to the local economy. It is felt that the scheme is incompatible with the area and would have a detrimental effect linguistically, and that quality jobs would not come as a result. The council does not have confidence in the business plan.

e) There are sufficient caravan spaces in the area already let alone the HGV traffic that comes with them.

f) Also, it is impossible to know who this company is, so there is no way of knowing by looking at their history so far what sort of employers we will have, how sympathetic they are to language, culture, community needs. Once again, they are from outside the area rather than a local or community company, so they don't have to be accountable to the community.

Transport Unit: The existing entrance is appropriate along with the passing places on the access track. Question whether 43 parking spaces are adequate for a 61-bedroom hotel.

Conservation Officer: There are no major concerns regarding the impact the redevelopment aspect of the site or lodges will have on Llwyn y Brain as it is not considered that these would have an impact on the layout of the building. A track already exists on the maps near the building, but please note from the plan that the new track would follow a different route to this track. If the finish of the new road were to be quite soft (rather than a large concrete scar) it may suit the site without having an impact, but without further detail I am unable to comment on this aspect of the application.

(Since receiving the Conservation Officer's comments please note that the access track has been removed from the application).

Natural Resources Wales: (Because of the number of responses and length of comments, only final comments are shown, previous comments can be found on the Council's website via the track and trace system.)

### **Response to the Appropriate Assessment:**

Thank you for consulting Natural Resources Wales (NRW) on your Habitats Regulations Assessment for the above development, which we received on 16th January 2024.

Our response should be taken as NRW's formal representation, as the appropriate nature conservation body, to your appropriate assessment (AA) (referenced/dated) under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, as amended.

In consideration of the mitigation measures detailed, we agree with your conclusion that the development is unlikely to have an adverse effect upon the integrity of the Glynllifon SAC.

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### **Response 24/11/23**

We refer to additional information submitted in support of the above application, which we received from the applicant on the 23rd October 2023, 7th November 2023, and 9th November 2023.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted:

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Condition 1: External Lighting Plan

Condition 2 - Updated Landscape Environmental Management Plan

Condition 3 - Ecological Compliance Audit

Condition 4 - Environmental Management

### **Protected Species**

We note that further information has been submitted in relation to impacts on protected species (specifically bats and otters):

- Brooks, B. (2023). Seiont Hotel, Wales Lighting Impact Assessment – Baseline Survey Report. The Lighting Bee. (Unpublished Report No 1276-LB-XX-XX-RP-E-7080-01)
- Flowers, C. (2023). Seiont Manor Hotel, Llanrug, Caernarfon Otter Survey. Wildbanks Ecology. (Unpublished).
- Humphreys, S., and Campbell, A. (2023). Proposed Lodge Development at Seiont Manor Hotel, Llanrug, Gwynedd. Application No.: C21/0861/23/LL Landscape and Environmental Management Plan (Revision 3). Land and Heritage. (Unpublished).

Bats and otters, and their breeding and resting places, are protected under the Conservation of Habitats and Species Regulations 2017.

### **Bats**

A revised LEMP was prepared following a series of bat surveys undertaken at Seiont through May, June and July 2023.

In our response dated 14th September 2023, we advised:

(a) Relocation of the maintenance track from the north side of Llwyn y Brain to an existing access track to the east.

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- (b) Including Llwyn y Brain into the suite of surveys.
- (c) Omitting Lodge 15.
- (d) Proposed new location of Lodges 22 to 25 away from the bat commuting route.
- (e) Inclusion of fencing and hedge planting.

In the updated LEMP, the applicant proposes:

- (a) The temporary track below Llwyn y Brain has been omitted.
- (b) Lodge number 15 has been omitted.
- (c) Lodges 22 to 25 have been moved 5 m to the west.
- (d) Buildings associated with the parking area to the north of the hotel have been removed and the layout of the parking changed to reduce potential lighting impacts on bats.
- (e) Fencing has been added around the Lodge area to deliver dark corridors for commuting bats with a lux level of  $\leq 0.5$  lux.

We advise that the applicant has appropriately considered our advice in respect of bats. Proposals include amendments to accord with our earlier advice, placement of wooden fencing and proposed consideration of external lighting.

An external lighting report has been submitted by the applicant. The purpose of the report was to record existing light levels throughout the site to inform the Ecological Assessments.

The external lighting report advised that to minimise lighting impacts on bats, it is recommended that any new lighting for the proposals is completely downward directional (with 0% ULOR), with warm white (2700K) LED light sources. It is recommended that no new floodlighting is added, and where possible that any existing floodlights are omitted rather than replaced, as flood lights are often angled in directions that cause excessive spill at ground level, and upward light pollution/spill.

We therefore advise your Authority to attach the following condition to any planning permission granted:

Condition 1: Prior to commencement of development, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall consider existing and proposed lighting together with any spillage originating from internal locations. Details shall include:

- a) An assessment of lighting in respect of wildlife interests of the site, notably bats and otter
- b) Details of the siting and type of external lighting and internal light spillage during and post development. This shall include plans illustrating the location and type of lighting together with Isolux drawings.
- c) Details to demonstrate that light spillage will not affect wildlife sensitive areas. This shall include plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats

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for foraging/dispersal purposes.

- d) Measures to monitor light spillage once development is operational (post-construction light monitoring).
- e) Ecological compliance audit external lighting key performance indicators.

Provisions of the scheme shall accord with the provisions of the Institution of Lighting Guidance Note 08/23: Bats and Artificial Lighting at Night

Lighting shall accord entirely with the details so approved for the duration of the operation of the development. Reason: To protect the wildlife and the ecological interests of the site including protected species.

### **Otters.**

We note the conclusions of the otter survey undertaken by Wildbanks Conservation. No contextual information has been provided within the provisions of the ecological submission. We advise that the survey is inadequate for the purposes of confirming that the pool is not functionally used by the local population of otter.

We advise that outstanding concerns remain with respect of otter, that primarily concern managing visitor pressure (including dogs). This could be addressed by fencing and restricting access to:

- a) the eastern woodland planting zone,
- b) within woodland habitats along the Afon Seiont.

We also note that invasive non-native species were detected during ecological surveys (American mink and Himalayan balsam).

We therefore advise your Authority to attach the following conditions to any planning permission granted, to address our concerns regarding otter:

Condition 2 - No development shall commence until an Updated Landscape Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall include, but not necessarily be limited to:

- (a) Build upon the principles outlined in the ecological report ((Reference: Humphreys, S., and Campbell, A. (2023). Proposed Lodge Development at Seiont Manor Hotel, Llanrug, Gwynedd. Application No.: C21/0861/23/LL Landscape and Environmental Management Plan (Revision 3). Land and Heritage. (Unpublished).
- (b) Defined aims and objectives for ecological feature including bats and otter (Detail shall include defined key performance indicators for each feature which can then be used for future monitoring purposes).
- (c) Submission of details concerning visitor exclusion areas. Details to include locations and specification of fences together with monitoring and maintenance regimes;
- (d) Locations of proposed and dedicated ecology areas to be provided to the LPA,



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NRW and the relevant local biological records centre.

- (e) Site wardening and ecological visitor awareness raising prescriptions.
- (f) Long-term surveillance and monitoring proposals including methodologies and reporting requirements.
- (g) INNS management and biosecurity; and
- (h) Periodic review mechanism for the Management Plan.

Condition 3 – The applicant shall submit an appropriate ecological compliance audit (ECA) scheme to the satisfaction of the LPA. The purpose of the Ecological Compliance Audit is to evidence compliant implementation of all ecological works specified in the LEMP (Version 3) together with Conditions 1 and 2 above. The Audit shall identify Key Performance Indicators (KPI's) that are to be used for the purposes of assessing and evidence compliance. The ECA shall be carried out in accordance with the approved details.

### **Protected Sites**

We continue to have concerns that a significant effect from the proposed development on the Glynllifon Special Area of Conservation (SAC) cannot be ruled out. The application is located within nine kilometres of the Glynllifon SAC.

Lesser Horseshoe bats, that roost within Llwyn Brain, use the surrounding habitat for foraging and commuting. Lesser horseshoes are a feature of the Glynllifon SAC. Section 2 of the August 2021 ecological report also notes that the bats may form part of the Glynllifon SAC population.

To secure appropriate mitigation measures, we advise that the conditions 1 to 3 set out above should be attached to any planning permission for this development. Provided the development is carried out in accordance with those conditions, we do not consider that it will adversely affect the integrity of the Glynllifon SAC.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC.

### **Environmental Management**

The proposed development would involve a significant construction scheme, with the potential to cause significant pollution, if not managed correctly. The construction scheme would also potentially create significant quantities of waste. We therefore

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advise that prior to commencement of any site clearance, or construction, that the applicant produces a Construction Environmental Management Plan (CEMP), that will consider these risks, and appropriate measures are followed. We would therefore advise that the following condition is attached to any permission:

Condition 4 - No development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed.
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; species and habitats protection, avoidance and mitigation measures.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
- Biosecurity risk assessment which includes measures to control, remove or for the long-term management of invasive species.
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.
- Ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site clearance, preparation and construction phases of the development.

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website:<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

### **Foul Drainage**

The applicant has confirmed within their email (Marc Hamilton, Cadnant Planning, 3rd November 2021) that the foul drainage from the site will drain to the main sewer.

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We welcome this approach. However, we note that the most recent plans i.e., Design Strategy, Steet Design Partnership, Drawing No. P.04, 09.08. 2023, and also the Proposed Site Plan, Street Design Partnership, Drawing No. P.04, 09.08.2023, are still showing a former Foul Treatment Plant. For the avoidance of doubt, we recommend that these plans are further revised to omit reference to the former Foul Treatment Plant. We would agree with Dŵr Cymru / Welsh Water's advice that a condition relating to foul water drainage is included within any permission. However, if an alternative form of drainage, i.e. private drainage is proposed, please re-consult us.

### **Flood Risk**

We have reviewed the Flood Consequence Assessment (Integra Consulting). It is noted from the FCA that the development site boundary shows that the proposal does not encroach into the flood risk area (Zone C2 as referred to in the Development Advice Maps or Zones 2/3 as shown on the Flood Map for Planning) associated with the river Seiont. We are therefore generally satisfied with the FCA which demonstrates that the flood risk can be managed and is in line with TAN15.

We have no other comments on flood risk although note that a drainage assessment is to be undertaken (Section 3.3). Therefore, the views of Gwynedd Council acting as both the Lead Local Flood Authority and the SUDS Approval Body should be sought on this aspect of the proposal.

### **Other matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our website. We have not considered potential effects on other matters and do not *rule out the potential for the proposed development to affect other interests*.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

Dŵr Cymru: Any planning permission needs to include the following conditions: -

- Detailed plan regarding disposal of foul water from the site.
- Survey for the assessment of the current flow and load of foul water received by Llanrug Water Treatment Works together with the results.
- If applicable, a consolidation scheme for the Water Treatment Works to be able to receive an additional flow from the development which is the subject of this application.

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Public Protection Unit: The following information required:-

- Full details of the biomass unit to be installed including manufacturers, model, thermal size and all technical information (such as thermal capacity (kw / MW), efficiency, maximum fuel consumption rate (kg /hr or m3 / hour), fuel specification)
- Details of maximum PM10, PM2.5 and NO2 emissions.
- The diameter and height of the stack which will serve the biomass unit above ground.
- The size and dimensions of the building on which the stack is placed.
- The size, measurements and distances of any building within 5 times the height of the stack above ground.
- A copy of the stack height calculation to justify the proposed height.

Any wood used in the biomass boilers must be new or untreated waste wood, outlined in the documents by the Wood Recycling Association. The applicant will need to receive documentation from the supplier to confirm this. If either biomass receives any other waste material as fuel, a Licence will be required under the Licensing Regulations Act

If any plant/units are to be installed externally (e.g. cooling air units etc) then a noise assessment must be carried out, which includes low frequency levels to indicate that it will not have a negative impact on the surrounding area.

Flood Risk and Land Drainage Our maps show that an open watercourse/in culvert runs through the proposed development site. We recommend that the developer identifies the exact route of the culvert and avoids installing / erecting any structures within 3m of the watercourse as this may prevent future maintenance. Any works that may affect the flow of the stream including further culverting will require an Ordinary Watercourse Consent to create new access.

Since 7th January 2019, sustainable drainage systems (SuDS) are required to manage surface water for all new developments of more than 1 house or where the construction area with drainage implications is 100m<sup>2</sup> or more. Drainage systems must be designed and constructed in accordance with minimum standards for sustainable drainage issued by the Welsh Ministers.

These systems must be approved by Gwynedd Council in its role as the SuDS Approval Body (SAB) before construction commences.

Due to the size and nature of the development an application may need to be made to the SuDS Approval Body for approval prior to the commencement of construction. It appears that the developer intends to drain the site in a suitable sustainable manner but until an application is made to the SAB there is no certainty that the site layout would enable compliance with the full set of national SuDS standards. Early consultation with the SAB is recommended.

Licensing Unit Paragraph 5.12 within the Design and Access Statement confirms that the proposed units will be structured chalets not 'caravans on wheels' therefore a site licence and its requirements will not be required.

However, the development will be subject to other legal provisions such as the

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Health and Safety at Work Act 1974 and the requirements of the Regulatory Reform (Fire Safety) Order 2005 under the enforcement of North Wales Fire and Rescue Service.

Language Unit: No response.

Biodiversity Unit (Because of the number of responses and length of comments, only final comments are shown, previous comments can be found on the Council's website via the track and trace system.)

### **Habitats Regulations Assessment**

The following is an assessment under the Habitats Regulations. The applicant has provided documents to support this process:

- Habitats Regulations Assessment by Land & Heritage dated 16th March 2023.
- Amended Landscape and Environmental Management Plan Rev 3 by Land & Heritage 23rd March 2023, updated 8th November 2023
- Lighting Impact Assessment, dated 27.11.23 produced by Lighting Bee
- Amended Bat survey report dated 14th August 2023 by Land & Heritage

### Habitat Regulations Assessment

Cyngor Gwynedd as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), must before deciding to give consent for a project which is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives.

### Appropriate Assessment

#### Proposal

Planning application for the remodelling and extension of the existing hotel and spa to together with the siting of 39 holiday lodges, formation of tennis courts, activity centre, reception, staff accommodation block and biomass plant room, with associated access roads, paths, parking and landscaping.

#### Location

The Seiont Manor Site is located 9km from Glynllifon SAC and the proposal is next to the Seiont River.

#### Likely Significant Effect

Llwyn y Brain is an old manor house that is part of Seiont Manor Site has a lesser horseshoe bat roost. The bats here are part of a metapopulation associated with the Glynllifon SAC, which is designated for its population of lesser horseshoe bats. Alternations to the Seiont Manor Site and especially an increase in external lighting is

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likely to impact bats. Lesser Horseshoe Bats are sensitive to light, and will keep away from illuminated areas where they are vulnerable to predation. Illuminated area can cause barriers to their flight paths while foraging or accessing their roost, this could eventually lead to abandonment of the roost. Bat surveys provided by the applicant identified 2 main Lesser Horseshoe Bat flight lines from Llwyn y Brain to the River Seiont.

#### Conservation Objectives of SAC

Glynllifon SAC is designated for its population of lesser horseshoe *Rhinolophus hipposideros* bats (Annex II species, which is the primary reason for the SAC designation). The estate includes three summer roost sites and two hibernation sites for the lesser horseshoe bat, comprising about 6% of the UK population. The main maternity roost is situated in the cellars of the Glynllifon mansion house, built during the 1830s. Within the estate, bats from the mansion forage in areas of plantation woodland along the Afon Llifon and on the southern side of the estate near to Plas Newydd. These areas also act as flight routes for bats going to other feeding areas outside the estate boundaries. A number of other bat species are found within the Glynllifon Estate. These include whiskered bat *Myotis mystacinus*, Natterer's bat *M. nattereri*, Daubenton's bat *M. daubentonii*, common pipistrelle *Pipistrellus pipistrellus*, soprano *P. pygmaeus*, noctule bat *Nyctalus noctula* and the brown long eared bat *Plecotus auritus*.

The Glynllifon SAC also contains areas of woodland which are used by the bats as managing areas as well as Hedgerows and other linear features used as Flight Routes. The conservation objectives for the SAC are as follows:

- The natural range of lesser horseshoe bats will not be reduced, nor be likely to be reduced for the foreseeable future.
- There is, and will continue to be, sufficient habitat to maintain the lesser horseshoe bat population on a long-term basis.
- The three maternity roosts will continue to be occupied annually by lesser horseshoe bats and their babies:
  - o Glynllifon Mansion (maternity and hibernation roost, Unit 16)
  - o Melin y Cim (maternity roost, Unit 32)
  - o Pen y Bont (maternity roost, Unit 36)
- There will be a sufficiently large area of suitable habitat surrounding these roosts to support the bat population, including continuous networks of sheltered, broadleaved and coniferous woodland, tree lines and hedgerows connecting the various types of roosts with areas of insect-rich grassland and open water.
- All factors affecting the achievement of these conditions are under control.

These conservation objectives as well as performance indicators and a core management plan for the site (albeit from 2008) can be viewed online on the Natural Resources Wales website.

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The performance indicators largely relate to the maternity and hibernation roosts themselves as well as maintaining woodlands and flight lines. It refers to 'good condition hedgerows' as being those more than 2m in height with no gaps over 5m in length.

#### Potential Impacts to Glynllifon SAC without mitigation

- Disturbance to Lesser Horseshoe Bat roost at Llwyn y Brain during construction due to noise and lighting
- Disruption and obstruction of bat flight paths & foraging habitat due to lighting during construction and operational.
- Loss of habitat used by bats as flight paths
- Loss of foraging habitat due to habitat destruction
- Loss of access to bat roosts

These impacts could lead to the abandonment of the bat roost at Llwyn y Brain and reduced functionality of the Glynllifon Lesser Horseshoe Bat population.

The proposal will not result in the direct destruction of Lesser Horseshoe Bat roosts. Llwyn y Brain is not within the current application area.

#### Mitigation

The development proposal has incorporated 3 dark corridors across the land from the hotel to the river, these will be provided by:

- Temporary Featherboard timber fencing 1.8m high to reduce light spill
- Tree & woodland planting
- Suitable external lights with fixtures and positions

These measures are to ensure the provision of dark corridors suitable for bat commuting with a Lux level of no greater than 0.5 lux. The proposed illumination calculations show that the boundary of the development will be between 0.3 and 0.2 lux (Lighting Bee Assessment November 2023).

There will be a lag time from when trees are planted until they have grown sufficiently to provide a wooded corridor, however the temporary timber fencing will ensure that the corridor is shaded from lighting. I recommend that the timber fencing is constructed first and the tree planting takes place before any other construction to provide as much time as possible for the trees to grow.

Although I have concerns about the proposed tree planting scheme specifications (as I have detailed in my previous comments to planning) because it lacks the sufficient density of tree planting, the aim of this planting is to provide a wooded corridor and habitat suitable for foraging bats and the proposed scheme can be amended to achieve this.

In the supporting document by Land and Heritage (Habitats Regulation Assessment, 16th March 2023) it states that construction of lodges will only take place during day light hours and no external lighting will be used for their construction.

The development proposal does not include the loss of wooded habitats apart from the removal of one or two trees, however the development proposal is not clear

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regarding the tree works and construction required on the driveway. This requires further information.

- Grassland enhancement for foraging bats
- Tree and hedgerow planting along the side of the access road to the lodge field will screen car headlights. This planting extends well beyond Llwyn y Brain to the west.

#### Assessment Alone with Mitigation

This proposal for holiday lodges and extension to the hotel has incorporated mitigation, and will not have an adverse impact to the conservation features of the Glynllifon SAC.

#### In-combination Assessment

In combination effects are those effects that may arise from the development proposed in combination with other plans and projects proposed/consented but not yet built and operational (i.e. those developments that are separate from the baseline).

There are several other proposed planning developments and projects with the potential to effect the Lesser Horseshoe Population of the Glynllifon SAC, these are:

- Peblig Industrial Estate
- Glynllifon – Welsh Sheep Centre
- Glynllifon – Dairy Development Proposal
- There are numerous planning applications for barn conversions & house renovations which are associated with Lesser Horseshoe Bat roosts and habitats.

Peblig Industrial Estate is a current planning application, yet to be determined located along the River Seiont and is 6.5km from Glynllifon SAC. The site has many derelict industrial buildings, some of which have been found to be Lesser Horseshoe Bat roosts. The proposal is to demolish the buildings and build new buildings for business use. As this proposal would result in the destruction of a bat roost, it has included the building of a bat roost and enhancing the river corridor as mitigation. This proposal is yet to be determined.

The Glynllifon planning applications for a Welsh Sheep Centre and Dairy Development are surrounded by the Glynllifon SAC. Neither of these proposals will directly destroy a Lesser Horseshoe Bat roost, they will result in the loss of a small amount of habitat, but the main concern is the lighting and illumination of the buildings. Both developments have provided mitigation which includes the provision of a bat loft suitable for Lesser Horseshoe Bats, hedgerow planting, tree planting and habitat enhancement and have ensured that lighting will not impact bats. These proposals have sufficiently mitigated impacts to the Glynllifon SAC and are yet to be determined.

There are numerous planning applications for barn conversions & house renovations which are associated with Lesser Horseshoe Bat roosts and habitats. None of these will be permitted unless they ensure that bat roosts and their habitats will be



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enhanced. Most of these sites were structures which were derelict and collapsing, without renovation would result in the loss of the bat roost.

#### Conclusion of in-combination assessment

These plans and developments have incorporated mitigation to avoid any impacts to Lesser Horseshoe Bats. Therefore, they will not contribute any impact to the Glynllifon SAC. The proposal at Seiont Manor in-combination with other plans and projects will not have an adverse impact on the conservation objective of the Glynllifon SAC.

#### Integrity Test & Conclusion of HRA

The proposal at Seiont Manor Site will not have an adverse affect on the integrity of the Glynllifon SAC.

#### NRW Consultation

As part of the HRA process Cyngor Gwynedd must consult NRW. In a letter dated 24th November 2023 NRW state that provided the development is carried out in accordance with their recommended conditions, they do not consider that it will adversely affect the integrity of the Glynllifon SAC.

#### Recommended Conditions to ensure that impacts to the Glynllifon SAC are avoided

1. Construction and works must only take place in day light hours and no flood lighting is to be used during construction.
2. Timber fencing to reduce light spill must be erected before any other works for construction take place.
3. Hedge and tree planting plans must be amended to be plant at a much greater density.
4. All hedge and tree planting (hedgerows, along driveway, woodland and for screening) must take place after the timber fence has been constructed and before any other works to install and construct lodges.
5. All existing flood lighting on Llwyn y Brain and Seiont Manor Hotel and driveway must be removed and if required replaced with lighting sensitive to bats. This must take place as soon as possible.
6. The bat roost at Llwyn y Brain is must be enhanced.
7. Monitoring of light levels must take place three times between April-September for the duration of the operation of the site.
8. Bat monitoring of the site once it is operational.

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### **Final Comments on the Application (03/01/24)**

Further to my comments in March this year, the applicant has provided the following:

- Amended Bat survey report dated 14th August 2023
- Amended Tree Survey August 2023 by Land & Heritage
- Grassland Fungi Assessment October 2023 by Debbie Evans, Mycological Consultant
- Otter Survey October 2023 by Wild Banks Conservation & Land & Heritage
- Lighting Impact Assessment, baseline survey report 27th October 2023 by The Lighting Bee
- Amended Site Plan dated 7th November 2023
- Amended Landscape and Environmental Management Plan Rev 3 by Land & Heritage 23rd March 2023, updated 8th November 2023
- Habitats Regulations Assessment by Land & Heritage dated 16th March 2023
- BS5837 Arboriculture Survey: February 2022 by Land & Heritage revised August 2023
- Lighting impact assessment date: 27.11.23 produced by Lighting Bee

#### Grassland Fungi

The fungi survey and report has been undertaken to a good standard, although only two survey visits were carried out. Over the 2 surveys a total of 23 grassland fungi species (waxcaps, fairy clubs, earth tongues, pink gills) were recorded on the site, including a total of 13 *Hygrocybe* Waxcap species. A summary of the species recorded across the whole site, comprised of 3 Clavarioids, 13 *Hygrocybes*, 5 Entolomas, 1 Geoglossaceae and a *Dermoloma*. Two, high value indicator species of an unimproved or semi-improved quality grassland habitat were recorded on the northern end of the Northeast Field, which will not have lodges sited on it. These 2 species and a further 2 species recorded here are of International conservation value. Citrine Waxcap *Hygrocybe citrinovirens* & Fibrous Waxcap *Hygrocybe intermedia* both are globally 'Vulnerable' (IUCN Red List) and thus of conservation concern. Crimson Waxcap *Hygrocybe punicea* were recorded on the east side of the field near the fence. This is a significant species regarded as an excellent indicator of old, traditionally managed, semi-natural grasslands.

The proposed development's footprint does not include the areas of conservation concern for grassland fungi. The fungal survey report recommends "*There is no need for any acid grassland restoration in the northern area and it should be preserved as it is.*"

I recommend that the recommendations in the fungal survey report be followed and that this is a planning condition.

#### Bat Surveys

The updated bat survey report 14th August 2023 includes the use of 11 locations for static bat detectors each over 6 nights. All detectors recorded Lesser Horseshoe Bat passes, except for 2 locations. A bat transect survey was also undertaken. Bat recorded included LHS, Brown Long-Eared Bat, Pipistrelle species, and *Myotis* species.

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The additional bat surveys have confirmed the previous bat roost locations and in addition have identified a soprano pipistrelle maternity roost within the main hotel and Lesser Horseshoe bat maternity roost within a chimney of Llwyn y Brain. Activity surveys have identified two main bat migration routes to and from the river to the hotel and Llwyn y Brain. The survey findings have informed the Scheme design and changes have been made to the layout and access provision. Additional mitigation measures have been incorporated to avoid adverse impacts to bats.

The information from surveys in the bat report indicate that there is a Brown Long-Eared Bat roost in Llwyn y Brain.

### Bats & Lighting

Lighting Assessment by Lighting Bee dated 27th November 2023 this report provides model for the proposed illumination of the site however does not include existing lighting as stated under 1.2:

*“No existing lighting has been included in the calculation model. In the areas where new lighting is proposed, all existing lighting is proposed to be removed. It has been assumed that the existing external lighting to the elevations and areas of the hotel not affected by the proposals, of the hotel will remain as existing, as these areas do not have the potential to directly impact onto the dark zones. Where any lighting is proposed to be replaced however, this will be specified in accordance with the parameters of this lighting strategy to reduce the lighting impacts on bats.”* This is concerning because around the hotel and Llwyn y Brain are areas that can impact bat flightlines, I recommend that the proposed new lighting for the hotel be included in the assessment.

Site illumination model and calculations Lighting Bee November 2023. This plan has not covered or calculated the illumination of the existing hotel or Llwyn y Brain or driveway. The proposed illumination calculations show that the boundary of the development will be between 0.3 and 0.2 lux (Lighting Bee Assessment November 2023), however the existing illumination (Lighting Bee – baseline report October 2023) on the hotel, car park and driveway includes numerous floodlights. There are currently about 5 floodlights on trees along the drive and 2 floodlights on trees around the car park and two lanterns.

The Lighting Assessment November report concludes under section 5:

*The aim of this Lighting Impact Assessment is to provide an assessment of the impact of the new external lighting associated with the development, and internal lighting from the proposed lodges on sensitive ecological receptors, in terms of predicted light spill onto the proposed dark zones. Lighting impacts in terms of obtrusive light are excluded from the scope of this report.*

I am a confused by the final sentence in the above statement; does it imply that current prominent lighting has been excluded because this will be removed? This requires clarification.

*Light spill from the combined internal and external calculated at the edge of the*

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*proposed dark zones is predicted to be <0.5 lux both horizontally at ground level, and vertically on the calculation planes (up to 2m in height) included, with the mitigation measures included.*

*It should be noted that the calculation model represents the worst case scenario, with all lights switched on simultaneously, no blinds or curtains included, and the screening effect of any vegetation and planting not being included, levels of illuminance will be further reduced when these factors are taken into account.*

*In conclusion, the lighting impacts from the proposals with the proposed mitigation applied, are not predicted to be significant.*

Lighting Impact Assessment, baseline survey report 27th October 2023 by The Lighting Bee. This report has mapped all existing lighting and recorded the types of lights.

The lighting baseline report is too vague stating “*that the perimeter of the main hotel building is predominantly lit, with a zone of influence of approximately 20-25m, where levels of illuminance are greater than 0.5 lux. Levels of illuminance throughout the main car park/ tarmacked entrance area are also greater than 0.5 lux. Levels of illuminance along the main access drive are expected to be significantly higher than recorded, and greater than 0.5 lux if the floodlights were operational at the time of the survey. The survey locations show that the northern fields, where the lodges are proposed, are currently dark (<0.5 lux).*”

The lighting report recommends that new lighting “*is completely downward directional (with 0% ULOR), with warm white (2700K) LED light sources*” and that no new floodlighting is that any existing floodlights are omitted rather than replaced.

Recommendation – updated illumination maps showing lux levels for whole site including the hotel, Llwyn y Brain, car park and driveway.

#### Habitats Regulations Assessment

Llwyn y Brain, part of Seiont Manor has a lesser horseshoe bat roost. The bats here are part of a metapopulation associated with the Glynllifon SAC, which is designated for its population of lesser horseshoe bats. Alternations to the Seiont Manor Site and especially lighting can impact bats.

The applicant has provided information to inform a HRA dated the 6th March 2023. This does not include the information from the bat surveys carried out in summer 2023. Under section 1.3 there is a table listing all the likely impact to the Lesser Horseshoe Bat colony at Seiont Manor, but it does not make an assessment of this development before then moving on under section 1.4 to consider in-combination impacts. The main concern is loss of bat flight routes due to habitat loss or lighting creating a barrier. The report states that the development will incorporate mitigation to reduce impacts to the bat colony, these include: wooden fencing to screen LHS bat flight routes from light spill; tree and hedge planting and grassland management to enhance foraging habitats. The design of the development has been altered to minimize the impact to Lesser Horseshoe Bats, and includes fencing to screen light spill and by planting woods and hedgerows.

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There will be a lag time (of more than a few years) for mitigation as tree planting until the tree have grown enough. The report concludes that providing mitigation measures are put in place, impacts to the Lesser Horseshoe Bat colony at Seiont Manor Site and therefore the Glynllifon SAC will be reduced to negligible. NRW (24th November 2023) do not consider that this development proposal will adversely affect the integrity of the Glynllifon SAC as long as conditions are in place to ensure that suitable mitigation is carried out and that dark corridors are retained along bat flightlines.

Cyngor Gwynedd as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), must before deciding to give consent for a project which is likely to have a significant effect on a SAC, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives.

This proposal has provided information to demonstrate that the development will not have an adverse impact on lesser horseshoe bats and the population associated with the Glynllifon SAC.

#### Landscape Management Plan & Bat Mitigation

This has been updated to follow the recommendations in the Fungi Report. Slow worms are present in small numbers in the grassland area next to the pond and the LEMP provides measures for their protection.

Under section 4.2.3 of the LEMP it outlines measures to create bat mitigation along the “Western Boundary dark edge” to create a 30 metres buffer zone. *The corridor will be screened with a 2.1 metre ( 7 feet) high timber fence at the rear of the lodges. This will be approximately 130 m in length ...A woodland area will be planted between the fence and the western boundary to provide additional screening. This will cover approximately 3450 square metres...Planting should be at an average density of one tree per 3.25 m<sup>2</sup> ( average spacing of 1.8 m or 3000 trees per ha) Approximately 1060 trees will be planted in this area. This is a high density of plants to provide screening as quickly as possible.”*

The proposed planting is not dense enough as it is a third of a tree per square meter, I recommend that at least 100 trees per meter square are planted. I also recommend that this is undertaken before the lodge construction commences to allow for this mitigation habitat to become established.

The under section 4.2.5 of the LEMP “North /South Migration Route”... “*This route following the existing farm track, is used by Soprano Pipistrelle bats and LHB*” It is proposed *The corridor will be screened with a 2.1 metre ( 7 feet) high timber fence at the rear of the lodges. This will be approximately 97 m in length. A native broadleaf hedgerow will be planted on the east side of the fence to provide additional screening.... The hedgerow should be planted 1m to the east of the timber fence. Whips should be planted at 150mm spacing in three offset rows which are 500mm apart. This is equivalent to 18 whips per linear metre, However I recommend that 7 rows are planted at a distance of 150mm apart, and that this is carried out before construction takes place.*

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### Otter

Otter Survey by Wild Banks Conservation & Land & Heritage dated October 2023, undertook a field survey on 9th October 2023. No otter signs were found but several potential holt sites, laying up sites and community habitats were noted. Otters are known on the Afon Seiont and there remains the likelihood that they travel through the site and have resting sites and a holt. The report recommends *“that any work within 30m of the water bodies on site should have pre-work commencement checks for otter activity or signs to ensure the likely absence of otters.”* I recommend that before any works otter surveys are undertaken and measures to avoid harm to otters are established.

### Bryophytes

No bryophyte survey has been undertaken. Records show that some of the boulders and walls creating boundaries in the fields along the river support uncommon mosses (*Grimmia lisae*, *Grimmia hartmanii*, *Hedwigia stellata*, *Pterogonium gracile*). I recommend that there is condition stating that all walls are to be retained as they are and any work to walls require ecological advice. The bryophytes must be monitored to ensure that the development is not impacting them.

### River

This development within 10 meters of the river, and abuts the trees. I recommend that a greater buffer (at least 20 meters) is between the trees/river and the development. This will protect the river corridor and ensure that the green infrastructure is maintained. Rivers and woodlands provide wildlife corridors and forms part of the localities green infrastructure. Planning Policy Wales 11 states (paragraph 6.2.4):

*“The planning system should protect and enhance green infrastructure assets and networks because of these multi-functional roles. The protection and enhancement of biodiversity must be carefully considered as part of green infrastructure provision...”*

I recommend that the number of lodges is reduced to ensure a sufficient buffer between trees and river from impacts of the development. See plan below on which I have marked a green line and I recommend that 4 lodges are omitted from the plans.

Construction is likely to cause run off and I recommend that Pollution Prevention Plan is provided.

### Non-native invasive species

Himalayan Balsam is abundant along the river and other areas in the site. This plant potentially poses a threat to the uncommon bryophytes. I recommend that it is eradicated every year for the perpetuity of the use of the site. It should be removed by pulling and cutting.

### Access & Driveway & Trees

The Transport Scheme (Focus April 2021) includes plans for the creation of 2 new passing places along the existing drive and the creation of a new track from the existing drive. The driveway has several large mature trees, which are a substantial

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part of the landscape. I am concerned that this work will damage the existing mature trees along the drive and that the creation of a new track will cause the loss of hedgerow. The Tree Survey report does not cover the driveway trees. These mature trees have a high potential for bat roosts and bryophytes and lichens of conservation concern. The LEMP (23rd March 2023) under 2.3 states *“The final Tree Protection Plan should also make recommendations for the protection of mature trees along the main hotel driveway from construction traffic. Currently the access route to site, the size and type of construction vehicles, and the size of material loads are all unknown.”* This is too vague to assess the impact to the trees or to ensure their protection. The large mature trees are likely to be a habitat for bats, lichens and bryophytes.

The Tree Survey (BS 5837 Arboriculture Survey revised August 2023) states in the summary *“The proposed Scheme will require the removal of eight young amenity trees from part of the hotel gardens. No other trees will need to be removed.”*, however it does not cover the driveway.

The report states under section 5.6:

*Construction traffic will use the main driveway to the hotel which is lined with mature trees on both sides. Currently these trees provide crown clearance for large commercial vehicles such as waste trucks and delivery lorries. It is proposed that the lodges will be of flat pack construction which will not require large vehicles for deliver. Existing height and width clearance is considered adequate, so that trees are not considered to be at risk of damage from construction traffic.*

But it has not considered the creation of passing places, nor has it assessed the trees along the driveway.

### **Summary & Recommendations:**

I object to this proposal until amended plans are provided to ensure that the river corridor is protected and until further information is provided regarding the impact to trees along the drive way. This development proposal still has the potential to have significant impacts on ecological features such as driveway trees and their associated species.

The above HRA has concluded that this development will not have an adverse impact on the Glynllifon SAC.

- **Bats & Lighting** –I recommend that an updated illumination map modelling lux levels for whole site including the hotel, Llwyn y Brain, driveway, and car park is provided. I recommend a condition for lighting and illumination monitoring before site is operational and after one year of site being operational. Light barriers must be in place, hedge planting must take place before construction commences to the satisfaction of the LPA. I recommend that all existing flood lighting is removed. Monitoring of lighting yearly once site operational.
- **River** - I recommend amended plans that ensure a buffer between the development and the river of 20 meters. A Pollution Prevention Plan must be provided.
- **Non-native invasive plants** - Himalayan Balsam eradication scheme covering at least 10 years (or for the perpetuity of the site while it is

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operational) by pulling and cutting and yearly monitoring and a report to be provided to the LPA every two years.

- **Trees & Bats & Epiphyte Cryptograms (Bryophytes & Lichens)** - More information regarding tree works on drive to create passing places. Ideally this is provided before the application is determined, however if the council wishes to grant permission, then a condition for detailed plans of work to driveway must be provided showing which trees will be felled or lopped. Bat surveys and lichen and bryophyte surveys of tree will be required. These must be provided before any works commence.
- **Bryophytes** - Condition for all walls around fields to be retained. Condition for bryophyte monitoring to take place within two years of the site being operational and again in five years.
- **Fungi** - Condition for recommendations of the Fungi Report to be followed. Before any works commence a fence must be erected to protect grassland fungi area. No vehicles on grassland areas of wax cap importance (see yellow areas on plan above for areas conservation concern identified in fungi survey). Before any ground works take place or construction take place and that the fencing shall be approved by the LPA.
- **Reptiles** - Condition to protect reptiles. A plan detailing suitable measures for translocating and protecting reptiles must be provided before any works take place.
- **Otter** - Condition – before works an otter survey must be undertaken.
- Condition for ecological clerk of works for all ground works and construction.

Gwynedd  
Archaeological  
Planning  
Service

Thank you for consulting us on the above application. Having reviewed the area of proposed works with reference to the regional Historic Environment Record (HER), I have determined that there is a potential for archaeological impact and would like to draw your attention to the comments below.

The proposed development is for the remodelling of and extension to Seiont Manor Hotel, a 19th century manor complex located on the western extent of Llanrug. Llwyn-y-Brain (Cadw ref. 22239, PRN 1988, NPRN 26735) is a grade II listed building, and is present throughout a historic map regression. Both the regional Historic Environment Record (HER) and National Monuments Record of Wales (NMRW) also record a number of sites and features within the immediate vicinity of the site.

It should be noted that GAPS responded to a pre-application consultation for this site recommending both *Desk-Based Assessment* and *Geophysical Survey*. The PAC document suggests that this work has not yet been pursued.

There is a potential for sub-surface remains of various periods in and around the manor complex, dating both the to the post-medieval activity associated with the manor as well as much earlier settlement. Medieval potential is suggested by an undated enclosure at Bryn-y-Fedwen (PRN 3462) and Roman potential is evident via the discovery of a coin hoard to the east of the site (PRN 3716). Two linear earthworks may extend into the application site: one is undated, and corresponds with a 19th century field boundary, but could have earlier origins (NPRN 423646); the other is recorded as a possible Roman road (PRN 17589), but does not align with known sections of this road (which connected the forts at Caernarfon and Caerhun), though the reported coin hoard does indicate some potential for Roman activity in this area.

In addition to these existing records, the location of the site adjacent to the Afon



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Seiont conveys a potential for as yet unknown prehistoric to Roman remains in particular, river valleys being routes for communication and transport, and favoured for settlement. Although previous landscaping may have had some impact upon any buried archaeology in the grounds close to the hotel, the fields proposed for lodge development appear to be undisturbed agricultural land, indicating that any archaeology present may be well preserved.

As per our pre-application response, further information is still required in order to better understand the archaeological potential of the development site, and allow for a better-informed planning recommendation. The work recommended comes under the category of archaeological pre-determination, primarily comprising of a formal programme of archaeological evaluation known as *Desk-Based Assessment*, as well as a *Geophysical Survey*. It should be noted that the survey may require further, follow-up evaluation work such as *Trial Trenching* in order to interrogate the results.

An appropriate, qualified archaeological contractor should be appointed to undertake the work, a database of which can be found either at <http://www.bajr.org/RACSMAP/default.asp> (British Archaeological Jobs & Resources) or at <https://www.archaeologists.net/civcrm-contact-distance-search> (Chartered Institute for Archaeologists). The appointed archaeological contractor must agree a specification for the work with GAPS before commencing the project.

Rights of Way Unit. If this planning application is granted, I would recommend that a condition is included on that planning permission stating that an application to divert the route should be submitted before any development works could commence.

The applicant is advised that Public Footpath No 31 Llanrug crosses the application site and it is an offence to block or divert any right of way unless it is made in accordance with the appropriate legislation. During the development phase and following completion of any development work it should be ensured that the right of way:

- remains open, unobstructed and safe for public use at all times;
- that no construction materials are kept on the surface of the public right of way;
- that there is no restriction on the width of the public right of way.

Before undertaking any work on site the applicant is advised to contact the Highways Authority Public Rights of Way Team for further advice.

Public Consultation: A notice was placed on site and nearby residents were informed. The notice period has ended and correspondence has been received objecting on the basis of the following:

- The application is invalid, in the absence of a Welsh Language Statement or a Welsh Language Impact Assessment Report for a site of 1,000m<sup>2</sup> or more.
- Granting the application would be contrary to JLDP Policy TWR 3.

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- The site is not eligible for consideration under the permitted exceptions to existing sites.
- There are already more than enough holiday accommodation provisions in the area, and allowing the application would be overdevelopment.
- The decision of the Arfon Council regarding Bryn Afon in 1987 can be regarded as a precedent for rejection.
- The provision of more accommodation facilities in the area is likely to lead to an increase in demand for second homes and self-catering holiday units, an increase in property prices, immigration and problems regarding lack of affordable homes. These trends erode the fabric of local society and undermine the existence of the Welsh language as a living community language.
- The local community is against the application.
- It is an intrusive development in the landscape.
- Development too large
- Loss of agricultural land
- Road concerns.
- Development outside the development boundary.
- Concern over the impact of the failure of the proposal on the open countryside.
- Proposal not positive to local businesses and residents.
- Too close to the River Seiont and a threat to wildlife.
- Threat to local woods
- Access is unsuitable for additional traffic generated by the proposal.

## **5. Assessment of the relevant planning considerations:**

### **The principle of the development**

- 5.1 The proposal includes the redevelopment of a hotel by erecting substantial extensions of size and scale to the existing structure together with siting 39 permanent lodges on land to the north of the hotel. The site is located in the open countryside outside any development boundary as defined in the LDP. Policy PCYFF 1 states that, outside development boundaries proposals will be rejected unless they are in line with other policies within the local development plan, national policies or that the proposal indicates that its location in the countryside is essential. The principle of development must, therefore, be assessed in accordance with the needs of Policy PCYFF 1.
- 5.2 The explanation of Policy PCYFF 1 states that the development boundaries were identified for each type of settlement in the Scheme other than clusters. Please note that development boundaries amongst other things prohibit inappropriate development from being located in the countryside, provide clear guidance and clarity on where exceptions can be supported, e.g. rural exclusion policy, identify places where development could be approved and promote effective and appropriate use of land and buildings. It is considered, therefore, that the remainder of the Plan area is subject to greater control and is largely restricted to developments requiring a rural location or meeting local rural demand, supporting rural diversification or rural sustainability.
- 5.3 With regard to the protection of the countryside, it can be recognised that some types of development are required if the location of the proposal is essential e.g. agricultural sheds and addresses the social, economic or environmental needs of the area. It is recognised that the hotel establishment is an existing commercial development on the site and has existed there for many years, and in that respect Policy PS 14 and TWR 2 are supportive of proposals which involve extending visitor attractions and improving and protecting the provision for existing serviced and

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self-catering accommodation. It is also noted that holiday units are a development that can be supported in the countryside under Policy TWR 3 and although the applicant states that there are several elements to the proposal (as noted above), they should be considered as one comprehensive development within the visual context and considering the viability of the development. Given the above and the other relevant policies, the proposal is not considered contrary to policy PCYFF 1.

### **Extending the existing hotel**

5.4 The principle of extending the hotel will be considered against the requirements of Policy TWR 2 of the LDP. Policy TWR 2 facilitates proposals for serviced holiday accommodation as long as the proposal complies with the criteria included within the policy, namely:

- i. In the case of new-build accommodation, that the development is located within a development boundary, or makes use of a suitable previously developed site;
- ii. That the proposed development is appropriate in scale considering the site, location and/or settlement in question;
- iii. That the proposal will not result in a loss of permanent housing stock;
- iv. That the development is not sited within a primarily residential area nor significantly harms the residential character of an area;
- v. That the development does not lead to an over-concentration of such accommodation in the area.

5.5 In relation to this particular intention, the criterion to be considered is criterion 'ii', namely that the scale of development is appropriate having regard to the site and location.

5.6 As has already been mentioned, the existing hotel is located in the open countryside and has been established on this particular site for some time. The present structure is a mix of single storey and two-storey structure made with natural slate roofs, natural stone walls and a gravel whipped rendering and in a form which more or less corresponds to a "Y shape" and the agent has defined the existing structure of the hotel as – (i) *rose garden wing*; (ii) *pool wing*; (iii) *spa wing* and (iv) *centre core*.

5.7 There will be no external alterations to the two-storey building with slate roof *rose garden wing* which is located below Plasty Llwyn y Brain. Within the *pool wing* space, it is proposed to create 4 new visitor rooms which would involve the creation of 7 curved windows in the roof facing east with a traditional design and a connection to the second floor of the *spa wing*. The proposed work on the *spa wing* (which is an 8.5m high two-storey building with ridged roof and installed on the western part of the hotel) will involve the creation of a three-storey structure ranging from 11.5m to 13.5m high with two slate roofs installed alongside each other creating two symmetrical gables from the west and this is the most visual element of upgrading the existing hotel. An element of the basement will have a *green* flat roof (biodiversity improvement) and will be located on the western gable of the *spa wing*. The proposed work to the *central core* (which links the two above wings together) will involve increasing the height of this section of the two-storey building to create a three-storey structure with a flat roof to replace the existing slate roof. External materials used on the proposed elevations will include natural slate roofs; *green* roofs;

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openings from wood-effect composite material; walls from a mixture of white coloured render or another alternative colour to be agreed with the Local Planning Authority; natural stones; glass panels and tree-effect vertical panels.

- 5.8 The proposed structure immediately north of the hotel will be a rectangular-shaped single storey structure with slate roofs and white-coloured rendering materials to the walls together with openings of wood-effect composite material. According to the contents of the Design Strategy Statement, the new structure is designed largely in a native architectural form with regard to form, mass and external finish including complementary local contemporary features and that the design follows the existing topography of the land together with the natural woodland of the local landscape. The proposal would also involve undertaking landscaping together with extensive groundworks within and on the edge of the application site in order to minimise the environmental impact of the development.
- 5.9 The nature and character of the landscape in which the hotel is located can be described as a *undulating* landscape that generally runs down from the south to the north and towards the banks of the River Seiont with a prominent hillock between the existing structure and the river itself.
- 5.10 In support of the application a Landscape and Visual Appraisal has been submitted and the Appraisal notes that the hotel and surrounding landscape are located within an undulating landscape with small to moderate hillocks within it, with the local landscape running down towards the river in the vicinity of the application site. The site is also surrounded by banks, shrubs and trees/woodlands. Any views of the development will be views from close to the site and from the nearby footpath network with views of the development as a whole from a distance between openings in the landscape and vegetation from the north-west. Whilst it is inevitable that the development would have an element of impact on the local landscape, such an impact would not be considered substantial and significant considering the design, nature and scale of extensions and alterations to the existing hotel; that part of the hotel is a backdrop to the new extensions together with the fact that the work would be located within a site that already contains an established structure.
- 5.11 It is also noted that there are a number of heritage assets in the vicinity of the application site including listed buildings and monuments together with the designation of Dinorwig Landscape of Outstanding Historic Interest on the northeastern part of the site. However, the development is not considered to adversely impact the setting or character of these designations (including the setting of grade II listed building at Plasty Llwyn y Brain) considering the location, nature, design and scale of development in relation to these designations.
- 5.12 Taking into account the above assessment, the development relating to improvements to the existing hotel is considered acceptable on the grounds of safeguarding visual amenities and heritage assets and therefore the proposal complies with the requirements of Policy TWR 2, PCYFF 3, PCYFF 4, AMG 3, PS 19, PS 20 and AT 1 of the LDP.

### **Siting of 39 holiday lodges**

- 5.13 Policy TWR 3: Chalet and static caravan sites and permanent alternative camping accommodation stating that static caravan sites, chalet or permanent alternative camping accommodation are permitted if a number of criteria can be complied with.

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- 5.14 Criterion i) refers specifically to a significant intensification of new developments. In order to define 'significant intensification' in this context, reference should be made to explanatory paragraph 6.3.69 which refers to the 'Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within each Landscape Character Area (as defined by the Gwynedd Landscape Strategy (2012)) the capacity of the landscape is assessed to determine the capacity of the local landscape for additional holiday caravan or chalet developments.
- 5.15 This particular development falls within Landscape Character Area LCA4 (Caernarfon Coast and Plateau). The Landscape Sensitivity and Capacity Study identifies indicative capacity for the Landscape Character Area (LCA). Specifically, in relation to the LCA relevant to this application it is noted that: - *Outside the AONBs and Special Landscape Areas there may be some capacity for small to very small scale development located sensitively and well designed, which should relate well to the built environment / existing urban land cover.* The Study defines very small developments as those up to 10 units and small developments between 10 - 25 units. Therefore, due consideration will need to be given to the scale of the proposed development in the location in question.
- 5.16 The development involves siting 39 lodges on a northern part of the application site with a private driveway as a cul-de-sac. There will be 32 lodges located on level land between the hotel and the River Seiont and 7 lodges will be located on the southern side of a hillock above an existing lake to the north-east of the hotel itself. Following concerns about the visual impact of the lodges in the landscape, the applicant has now removed lodges from the most prominent part of the hillock and repositioned them on the level ground area below the hillock itself.
- 5.17 The lodges will be single storey with a gable roof and of wood-effect composite material. They would be 12.8m in length, 6.7m wide with parking spaces for 2 cars parallel to the lodges themselves. Existing trees will be retained between lodges locations and proposed landscaping and planting of vegetation within the lodge site and along the edges where spaces currently exist.
- 5.18 In accordance with the *Gillespies* Study, the number of units (39 lodges) offered on this site exceeds that recommended in the Study, which was 25 units. However, it must be noted here that paragraph 0.8 of the Study states - "*It is important to note that this report represents a strategic study and is not prescriptive at an individual site level. It does not replace the need for the Councils or Park Authority to assess individual planning applications or for specific local landscape and visual impact assessment as part of formal EIA on a case-by-case basis.*"
- 5.19 As referred to above, a visual impact assessment has been submitted with this application in the form of Landscape and Visual Appraisal taking into account the context of the site, a wider assessment of its context together with undertaking a *Zone of Theoretical Influence* scene assessment of the landscape. The *Gillespies* Study identifies 8 guidelines that need to be considered when dealing with applications for chalets and caravan parks within LCA4: -
- (i) Landform - the development is designed and sited so that it *works with* the existing landscape taking into account the ground levels and topography of the local landscape.
  - (ii) Landcover – the development has been well screened by vegetation and structures together with consideration of the topography of the local area.

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- (iii) Man-made influences - man-made structures are located within the application site and in the vicinity of the application site in the form of a structure comprising dwellings, agricultural holdings including agricultural structures, stone walls and water treatment works. It is considered that these man-made influences would reduce the impact of the development on visual amenities.
- (iv) Visibility, vistas and views - taking into account the layout and design of the lodges in the landscape and that the close views of the lodges themselves from the nearby footpath network with views of the development as a whole from afar and between openings in the landscape and vegetation from the north-west, the impact is not considered substantial nor significant. In order to contribute towards reducing visual impact, it is proposed to undertake a landscaping and planting scheme within and around the site.
- (v) Scenic quality and character - the application site is not designated for any particular landscape area even though it is located in the countryside. The north-eastern part of the site is included within the Dinorwig Landscape of Outstanding Historic Interest designation, however the siting of 7 lodges on the southern side of the hillock will not be considered to have a substantial impact on the setting and character of this wider designation.
- (vi) Remoteness and tranquillity - the site is located close to the settlement of Llanrug to the west, and is served by a busy road network surrounded by a varied number of land uses which contribute to anticipated disturbance of this part of the countryside. Consideration must also be given to the fact that the site currently has legal use as a hotel and that such uses, including associated activities, create an element of noise disturbance. Whilst it is inevitable that the development would have an element of additional impact on the tranquillity of the area, such impact would not be considered substantial or significant given the layout of the cabins within the landscape and that the site has been partially screened by existing vegetation as well as additional vegetation by undertaking landscaping and groundworks within and around the site.
- (vii) Landscape value – as referred to above, there is no designation of special landscape area for this part of the countryside.
- (viii) Historic value - as referred to above, the northeastern part of the site is included within the Dinorwig Landscape of Outstanding Historic Interest designation, however the siting of 7 lodges on the southern side of the hillock is not considered to have a substantial impact on the setting and character of this wider designation. A number of heritage assets lie within the vicinity of the application site such as monuments and scheduled buildings but taking into account the location, layout, scale and nature of the development it is not considered to have substantial adverse effects on the character or integrity of these assets.

5.20 To ensure that the site is developed in an orderly rather than piecemeal fashion, a condition may be included if it is recommended that the application be permitted, requiring the development be carried out in stages so that the holiday accommodation element cannot be developed separately from the development of the existing hotel and vice versa and, to this end, the applicant through his agent has confirmed that the development is an integral part of the hotel site as a whole. That will also ensure that the holiday accommodation element forms part of a wider tourism development that provides services beyond a holiday park alone. As a result, the development will offer quality tourism that will support the economy of the area. Taking into account the above appraisal, the principle of this current development in terms of policy TWR 3 is considered

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acceptable but it is also necessary to comply with all other relevant policies within the LDP and these are discussed below.

### **Visual amenities**

- 5.21 The proposal involves the development of an existing hotel site by undertaking refurbishment and improvements which include the extension of the structure and the construction of a new structure and a change of land use for the siting of holiday accommodation in the form of lodges and the creation of a temporary driveway in the countryside to the west of the settlement of Llanrug. The above appraisal sets out the local planning policies relating to the principle of the intent and which include its visual impact on the local and wider landscape and in addition to these policies the requirements of Policy PCYFF 3, PCYFF 4 and AMG 3 of the LDP should also be considered. Policy PCYFF 3 encourages high quality proposals based on layout, appearance, scale, height, mass and elevation treatment whilst respecting the context of the local landscape. Policy PCYFF 4 states that all proposals should integrate with their surroundings and Policy AMG 3 states that development will need to demonstrate that they do not have a significant impact on qualities and features unique to the local landscape in terms of visual, historic, geological, ecological and cultural aspects.
- 5.22 In support of the application, a Landscape and Visual Appraisal has been submitted, taking into account the context of the site, a wider assessment of its context together with undertaking a *Zone of Theoretical Influence* scene assessment of the landscape. The assessment anticipates that any views of the development will be views from close to the site and from the nearby footpath network with intermittent views of the development as a whole from a distance between openings in the landscape and vegetation from the north-west. Taking into account factors such as layout, scale, nature, design, topography, landscaping and proposed groundworks as well as considering that the application site is not designated for any particular landscape of visual amenity (apart from a small section in the north east of the site designated as a special historic landscape), it is not considered that the proposal as a whole would create substantially incompatible features within the local landscape than within the wider landscape and the development is considered to have a moderate impact on visual amenity. It is therefore considered that due consideration is given to its natural, historic and built environmental context and that it complies with the requirements of Policy PCYFF 3, PCYFF 4 and AMG 3 of the LDP.

### **General and residential amenities**

- 5.23 Policy PCYFF 2 states that proposals will be refused if they would have a substantial adverse effect on the health, safety or amenity of occupiers of local properties due to increased activities, disturbance, noise, light pollution or other forms of pollution or disturbance. Commercial properties are located along with residential dwellings around the site including Glanrafon Farm (351m north); Glan Seiont (267m west); Sŵn y Gwynt (507m south-west); Challoner Caravan Park (260m south-east) and Bryn Afon (303m east). The existing hotel is situated together with much of the holiday accommodation site on a low plateau in the local landscape with 7 holiday accommodation sited on the southern part of a hillock and as noted in the above assessment, the site is located close to the west of the settlement of Llanrug and served by a busy road network with a varied number of surrounding land uses which contribute towards the anticipated disturbance of this part of the countryside.

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- 5.24 Consideration must also be given to the fact that the site currently has legal use as a hotel and that such use, including associated activities, create an element of noise disturbance. Whilst it is inevitable that the development would have an element of additional impact on the tranquillity of the area, such impact would not be considered substantial nor significant given the layout of the lodges within the landscape and that the site has been partially screened by existing vegetation as well as additional vegetation by undertaking landscaping and groundworks within and around the site. To this end, therefore, it is considered that the proposal is acceptable based on the requirements of Policy PCYFF 2 of the LDP which seeks to protect the residential and general amenities of occupiers of adjacent properties.

### **Transport and Access**

- 5.25 The site is served by a private single driveway which extends from the hotel to the junction with the class 1 A.4086 county road (Llanberis Road). It is proposed to create 2 new laybys along the existing driveway for additional traffic; create a temporary driveway for construction traffic; provide 2 parking spaces for each holiday accommodation; provide 13 parking spaces near the outdoor activity area; provide 43 parking spaces parallel to the main hotel building together with parking and turning areas for service vehicles within the site.
- 5.26 In support of the application on grounds of road safety and parking considerations, a Transport Statement has been submitted and the Statement concludes that the proposal would create a suitable development for its location in terms of road safety and traffic. The existing junction with the county road is suitable for increased traffic in and out of the site, and there is adequate provision of parking within the site for the needs of the development itself. The proposal would not require improvements outside the site to make it acceptable based on road safety. Following the statutory consultation process, the Transport Unit has stated that the existing entrance is appropriate as the proposal includes passing places on the sides of the driveway to the hotel itself but questions are raised as to whether the parking provision for 43 cars is adequate for a 61-bedroom hotel. The Wales CSS document identifies for hotels in the countryside that 1 space is required for a commercial vehicle; 1 space for every 3 members of staff and 1 space for each bedroom. However, it must also be noted that the site is considered an accessible site (see below) and consideration given to extending and increasing parking spaces within the site taking into account the area of land owned by the applicant and this can be achieved by including a relevant condition should this application be granted.
- 5.27 As referred to above, the site is crossed by public footpath No 31 Llanrug and to this end the Countryside Access Unit has identified that as a result of the statutory consultation process, a condition will need to be included within any planning permission stating that the applicant will need to submit an application to divert the route first before commencing any development works. Taking the above assessment into account, it is considered that it is an acceptable proposal based on the requirements of Policy TRA 2 and TRA 4 of the LDP.

### **Biodiversity matters**

- 5.28 Several responses were received from the Biodiversity Unit and Natural Resources Wales stating that further information regarding protected species would need to be submitted together with biodiversity improvements and the provision of a Shadow Habitats Regulations Assessment (HRA). As seen from the Biodiversity Unit's comments (03/01/24) several additional and revised reports have been received on the application in response to the consultants' concerns. The HRA process needed to be completed as there are landscape features, including trees and hedgerows connecting the site to the Glynllifon Special Area of Conservation (SAC) protected because of its



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bat population. Although the agent has submitted a shadow HRA assessment as part of the application, the Council has a duty as the competent authority to complete the assessment. The shadow HRA is therefore to assist the council in its assessment. A copy of the Council's assessment can be seen as part of the comments from the above Biodiversity Unit. In accordance with the Habitats Regulations, NRW was consulted on the conclusions of the appropriate assessment, and comments were received from NRW confirming that it agreed with the council's conclusions.

- 5.29 In response to all additional information NRW was satisfied that the development could be managed through conditions. Please note that the Council's Biodiversity Unit continues to object to the proposal due to the proximity of the holiday units to the river and potential impact on the trees along the access road. The concern about the river corridor is acknowledged but there is no evidence of any negative impact arising from the current setting. The appropriate assessment has also concluded that the development is unlikely to have an adverse effect on the integrity of Glynllifon SAC. Measures are in place to prevent light pollution with a 2.1m high wooden fence to the rear of the units, together with planting and then an agricultural fence to prevent access to the river. With all these measures in place it is not considered justified to request a revised plan nor to refuse the application on these grounds.
- 5.30 The comments still refer to the temporary access track that has already been withdrawn from the application and as a result, that part of the objection no longer applies. The other part of the concern relates to the existing trees on all sides of the existing access track and the potential for the construction traffic to damage the trees. Impact on trees is a material consideration when assessing an application but please note that there is no tree preservation order protecting any trees on the site. It must also be remembered that until a few years ago the hotel was in use and a variety of traffic was going to the hotel and this would have included lorry deliveries. However, it is likely that there is potential for the construction traffic to be greater than normal service vehicles. It is possible to impose a condition on any consent to agree any work required for the trees together with a transport management plan to protect the trees along the access road. With appropriate conditions placed on the development it is possible to overcome the Biodiversity Unit's concern and it is believed that this development will meet the requirements of Policies PS19, AMG 3 and AMG 5 of the LDP which encourage proposals to conserve and, where appropriate, to enhance biodiversity in the area.
- 5.31 On 7th February 2024, the Welsh Government published an update to Planning Policy Wales (PPW), which covers green infrastructure, net benefit to biodiversity, the protection afforded to SSSIs and trees and woodlands. The changes to PPW have been considered together with the comments from the Biodiversity Unit but, in this case, they do not raise any new issues that have any material influence on the decision and the content of the ecological reports and the ability to set conditions to ensure mitigation and enhancements to biodiversity are considered sufficient to meet the needs of PPW.

### **Language Matters**

- 5.32 In accordance with the Planning (Wales) Act 2015 there is a duty to consider the Welsh language when making a decision on a planning application, where it is relevant to that application. This is reinforced further by para 3.28 of Planning Policy Wales (Edition 10, 2018) together with Technical Advice Note 20. The Supplementary Planning Guidance (SPG) 'Maintaining and Creating Distinctive and Sustainable Communities' (adopted July 2019) provides further guidance on how Welsh language considerations are expected to be incorporated into all relevant

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developments. It is noted that there are some specific types of development where the proposal will need to submit a Welsh Language Statement or a Welsh Language Impact Assessment Report. In this case a Welsh Language Statement has been submitted with the application which concludes that: - (i) an overall beneficial effect on the Welsh language in the area; (ii) the proposal would provide a wide range of holiday accommodation increasing the choice of quality holiday accommodation in the area; (iii) the construction and post-completion operational arrangements would support the local economy whilst promoting a sustainable Welsh community; (iv) undertaking mitigation measures to support the local labour supply chain during construction; (v) internal and external bilingual signage and (vi) a second chance for those who lost jobs when the hotel closed back in 2016 and keeping the name “Seiont” as an integral part of the development itself.

- 5.33 Although no response has been received from the Language Unit to the proposal and in order to ensure that the proposal itself complies fully with the requirements of Policy PS 1, specifically criteria 4 and 5 which note the need to ensure bilingual signs and a Welsh name on the new development, it is intended to reinforce a standard condition that would require details to be agreed regarding these elements. In doing so, it is considered that there would be a positive effect on the local community and that it would add to protecting the linguistic character of the local area. Taking into account the above assessment, the development can be considered acceptable based on the requirements of Policy PS 1 together with the SPG: Maintaining and Creating Distinctive and Sustainable Communities.

### **Sustainability matters**

- 5.34 As referred to in the above assessment, the site is located in the countryside on the western edge of the village of Llanrug. Policy PS 5 (Sustainable Developments) supports developments that are consistent with the sustainable development principles, and where appropriate developments should: “Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport in accordance with Strategic Policy PS 4”. This is supported by bullet point 4 of Policy PS14 (The Visitor Economy), which states: *Supporting appropriately scaled new tourist provision and initiatives in sustainable locations in the countryside through the reuse of existing buildings, where appropriate, or as part of farm diversification, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives.*
- 5.35 LDP policies are considered to be consistent with national planning policies in terms of how they deal with the principles of sustainable development. Paragraph 3.35 of PPW (Edition 10, Dec. 2018) states: *“In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys.*
- 5.36 This is supported by paragraph 3.11 of Technical Guidance Note 18: Transport which states: *Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas. Most development should be located in places accessible by*

*a range of travel modes.* In addition, paragraph 3.15 of TAN 18 states that tourism proposals, particularly in rural areas, should demonstrate access by a choice of modes to avoid the requirement to travel by car and, in rural areas, a lack of public transport access needs to be

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balanced against the contribution tourism makes to the rural economy in the specific area. In addition, it is noted that the nearest village to the site offering a limited range of services is Llanrug (556m north-west).

5.37 The following information is noted when considering the sustainability and accessibility of the site: -

- Official bus stops closest to the site are parallel to and opposite the main entrance to the site itself.
- A footpath/pavement is located 250m east with a green carriageway parallel to the highway between the main entrance and the footpath.
- There is a network of public footpaths in the area including footpath number 31 Llanrug which runs through the application site.
- There is a wide road network in the vicinity of the site with direct access to Eryri (Snowdonia) and the National Park.
- The proposal would provide services and facilities within the site avoiding the need to travel.

5.38 The *Chartered Institution for Highways and Transportation (CIHT)* in their document *Providing for Journeys on Foot (2000)* recommends walking distances (which are relevant to this application i.e. outside town centres and commuter areas: - 400m (desirable), 800m (acceptable) and 1.2km (optional maximum). It is also noted in appeal judgements that Inspectors have used the 800m distance as an acceptable distance to undertake a *comfortable* walking journey.

5.39 Although it is acknowledged that the majority of the users of the development would use a private car to reach the site there are different options for using alternative modes of transport once they have arrived at the site including cycling, public transport and by foot. The applicant has also confirmed that there will be some parking spaces for electric cars, as well as charging points. To this end, therefore, it is considered that the proposal is acceptable based on the requirements of Policy PS 5 and PS 14 of the LDP and that it complies with the advice contained in TAN18, TAN 23 and PPW.

### **Agricultural land matters**

5.40 The document Planning Policy Wales, Edition 11, states that *Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)16 is the best and most versatile, and should be conserved as a finite resource for the future.....Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.*

5.41 The need to protect the best agricultural land is highlighted in strategic policy PS 6: Mitigation of the effects of climate change, which states that proposals will only be permitted where it can be demonstrated with appropriate evidence that they have taken full account and responded appropriately to a series of points including: "Safeguarding the best and most versatile agricultural land, promoting allotments, support opportunities for local food production and farming in order to reduce the area's contribution to food miles (point 6)"

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5.42 Although the proposal involves the loss of an element of Class 3a agricultural land together with land not recorded within the Welsh Government's Land Classification, factors such as: - (i) that the proposal is otherwise acceptable in terms of other Planning policies and that the development is justified (ii) that the proposal involves extensive landscaping and groundworks; the retention of existing vegetation including trees, shrubs and hedges; (iii) the imposing of ecological mitigation measures; (iv) the prevention of pollution within any planning permission together with (v) noting that the minimum area of Class 3a land is to be partially developed as part of the application in comparison with the remaining class 3a land in the site's catchment, it is not considered that the intention to permit the application would undermine Policy PS 6 as well as the guidance within Planning Policy Wales.

### **Infrastructure / drainage**

5.43 The information submitted as part of the application confirms that there is an intention to connect the development to the main public sewer. Dŵr Cymru has confirmed that conditions will be required to receive further information to ensure that the proposal does not overflow the sewerage system. The following information must be received before commencing any work on the site:

- Detailed plan regarding disposal of foul water from the site.
- Survey for the assessment of the current flow and load of foul water received from Llanrug water treatment works together with the results.
- If applicable, a consolidation scheme for the Water Treatment Works to be able to receive an additional flow from the development which is the subject of this application.

It is therefore considered that the proposal does comply, with conditions, with the requirements of policy ISA 1 of the LDP.

5.44 Policy PCYFF 6 requires proposals to incorporate water conservation measures where practicable, including Sustainable Urban Drainage Systems (SUDS) and that proposals over 1,000m<sup>2</sup> should be supported by a water conservation statement. Water Conservation Statement matters have been addressed as part of the Planning statement received which confirms the intention to provide a Sustainable Urban Drainage System, and whilst the statement does not provide full details for achieving this, it is considered acceptable in terms of policy requirements PCYFF 6 of the LDP.

### **Archaeological matters**

5.45 Gwynedd Archaeological Planning Service (GAPS) states that the archaeological potential of this site is for remains that may date back to the prehistoric and Roman age with existing records of some historic features present in the area. In order to gain a greater understanding of the potential for additional heritage assets, it was recommended that initial archaeological research be completed before a decision is made on the application, in the form of a Desk Assessment together with a Geophysical Survey and trial trench.

5.46 The agent is aware of this but asked whether it was possible to impose a condition on any consent. It is ideal to receive information before the application is determined as there is potential for archaeological issues to cause delays and additional costs or if there was a need to avoid specific areas, the plans would need to be amended. As the agent is aware of the risk and willing to agree

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a programme of archaeological work by condition, it is considered in this case that the proposal is able to comply with policy AT 4 of the LDP.

## 6. Conclusions:

- 6.1 In assessing this current planning application, full consideration was given to the comments received from residents and statutory consultants, and by assessing the intention in its entirety, no substantial adverse effect was identified contrary to local planning policies and relevant national advice. To this end, therefore, it is believed that the proposal is acceptable subject to the following conditions.

## 7. Recommendation:

- 7.1 Delegate the right to the Senior Planning Manager to grant the application subject to the following conditions:

### Consent – conditions: -

1. 5 years.
2. In accordance with the revised details submitted with the application.
3. Submit details to be agreed in writing with the LPA from the biomass unit before commencing any work on the site.
4. Provide details to be agreed in writing with the LPA of examples of external uses for the extensions and external elevations of the holiday accommodation/lodges before commencing any work on the site.
5. Submit a Construction Method Statement before commencing any work on the site.
6. Condition of application to the Rights of Way Team for diversion of Footpath No 31 Llanrug which runs through the site.
7. Dŵr Cymru's condition with regard to the introduction of a foul water drainage plan before commencing any work on the site.
8. Dŵr Cymru's condition regarding the submission of details of the capacity of Llanrug Water Treatment Works to be approved by the LPA before commencing any work on the site.
9. Introduce an Environmental Construction Management Plan before commencing any work on the site.
10. Submit details of a programme of archaeological work to be agreed in writing with the LPA to include an archaeological evaluation programme and geophysical survey.
11. Submit a detailed report of the archaeological work required by condition (10) which is to be permitted in writing by the LPA.
12. Complete the development in stages to be agreed in writing with the LPA.
13. Compliance with mitigation measures within ecological and arboriculture documents.

<b>PLANNING COMMITTEE</b>	<b>DATE: 26/02/2024</b>
<b>ASSISTANT HEAD OF DEPARTMENT'S REPORT</b>	

14. Limit the use of holiday lodges for holiday use only and not as permanent residential accommodation.
  15. Introduce a detailed plan regarding landscaping and groundworks to be agreed in writing with the LPA.
  16. Introduce an Ecological Mitigation and Enhancement Plan to be agreed in writing with the LPA.
  17. Submit a revised Landscape and Environmental Management Plan to be agreed in writing with the LPA.
  18. Introduce a scheme that provides additional parking spaces within the site.
  19. To agree details of Welsh names for the development together with signs advertising and promoting the development.
  20. Agree a lighting plan.
  21. Introduce an ecological compliance audit.
  22. Introduce and agree a transport management plan to protect trees along the access road
- Notes and advice for the applicant relating to the responses of the statutory consultants.