

PLANNING COMMITTEE	DATE: 15/06/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 7

Application Number: C21/0590/17/LL

Date Registered: 10/12/2025

Application Type: Full

Community: Llandwrog

Ward: Groeslon

Proposal: Application for the change of use of land for the creation of a holiday touring site for caravans, motor homes (25 units) and tents (10 units), demolition of existing amenity building and erection of a new amenity building and associated developments

Location: Fferm Grafog, Y Groeslon, Caernarfon, Gwynedd, LL54 7UE

Summary of the Recommendation: TO APPROVE SUBJECT TO CONDITIONS

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1. Description:

- 1.1 Application for the change of use of land for the creation of a holiday touring site for caravans, motor homes (25 units) and tents (10 units), demolition of existing amenity building and erection of a new amenity building and associated developments.
- 1.2 As part of the proposal, it is also proposed to widen and improve the access to the A487 Trunk Road, including the installation of formal warning signs, which will facilitate the safe and efficient flow of traffic between the site and the A487.
- 1.3 In addition, the development includes the installation of connection points, an access track, a waste storage area, low-level lighting, and landscaping planting. It also includes associated drainage works, including the installation of sewage treatment works that will flow through an attenuation pond into a stream that runs along and within the southern boundary of the application site.
- 1.4 This is a countryside site with the entrance located directly from the A487 Trunk Road. The site is approximately 140m north of Penygroes roundabout and opposite the Inigo Jones Slate Works. Currently, the existing single-track entrance serves the farm and the existing certified site, which allows for five caravans and ten tents throughout the year.
- 1.5 The site is located in a Wildlife Site and within a Surface Water Flood zone and Small Watercourses 2 and 3.
- 1.6 The Glynllifon Site of Special Scientific Interest and Special Area of Conservation are approximately 130m from the site across the Trunk Road.
- 1.7 The application is submitted to the Planning Committee as the size of the site exceeds 0.5ha.

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 planning decisions should be in accordance with the Development Plan, unless material considerations indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.
- 2.2 The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the 7 well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching 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 own needs.
- 2.3 **Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017**
 - PS 1: The Welsh Language and Culture
 - PS2: Infrastructure and Developer Contributions
 - ISA1: Infrastructure Provision
 - PS 4: Sustainable transport, development and accessibility

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TRA 2: Parking standards

TRA 4: Managing transport impacts

PS 5: Sustainable Development

PCYFF 1: Development boundaries

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PCYFF 4: Design and landscaping

PS 14: The Visitor Economy

TWR 5: Touring caravan sites, camping sites and temporary alternative camping accommodation

PS 19: Conserve and where appropriate enhance the natural environment

AMG3: Protecting and improving features and qualities that are unique to the character of the local landscape

AMG 6: Protection Sites of Local or Regional Significance

Supplementary Planning Guidance

SPG: Maintaining and creating distinctive and sustainable communities (2019)

SPG: Tourist facilities and accommodation (2021)

2.4 National Policies:

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 12 - February 2024)

Technical Advice Note: 5 Planning and Nature Conservation (2009)

Technical Advice Note: 12 Design: June (2016)

Technical Advice Note 15: Development and Flood Risk (2004)

Technical Advice Note: 18 Transport: March (2007)

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3. Relevant Planning History:

3.1 No relevant history.

4. Consultations:

Community/Town Council:

Llandwrog Community Council 20/07/2021 - Support the application subject to consideration being given to legal proceedings under the disability discrimination act. No provision for access to the toilet block was considered and legally facilities should be provided for the disabled.

Llandwrog Community Council 20/12/2022 - Decision of Llandwrog Community Council (19/12/22 meeting) – **no objection**

Transportation Unit:

Comments 29/06/2021:

I refer to the above application and confirm that there is no objection to the proposal by the Transportation Unit as it is assumed that it will have no impact on the local county road network.

The site is dependent on direct access from the A487 and I recommend consulting the Welsh Government's Trunk Roads Unit for comments on transport matters.

I also recommend consulting with the Rights of Way Unit as a restricted byway runs along the farm access road.

Comments 12/07/2023:

I note the site is accessed from the A487 Trunk Road, and therefore I do not propose to make a recommendation.

Natural Resources Wales:

Latest comments 10/10/23:

Thank you for consulting us on the additional information (proposed lighting scheme, asbac lighting, Project Number AMS7275, 15.09.2023) in support of the above application, which we received on the 20th September 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 condition to any planning permission granted: Condition – Lighting Plan Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below. Protected Sites/Protected Species This site is approximately 25 metres from the Glynllifon Special Area of Conservation (SAC) and Glynllifon Site

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of Special Scientific Interest (SSSI). The main feature of these two protected sites is its Lesser Horseshoe Bat population. We also wish to note that bats are also protected species, and that bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017.

The vegetation around the boundary of this site is functionally connected to the SAC and the lesser horseshoe bats are known to cross the A487 in this area. We understand that a survey program is ongoing by YGC on behalf of the Welsh Government to ascertain the level of activity across this road. We have concerns that harm from the proposed development on the SAC cannot be ruled out. We've reviewed the additional including submitted in support of this application, including emails from D P Jones, 25th July 2023, and Stuart Kato, eco-scope, also dated 25th July 2023. The applicant has also now submitted a proposed lighting scheme, (asbac lighting, Project Number AMS7275, 15.09.2023). We note the overview in Section 2.3.2 . This plan suggests the provision of dark corridors and consequently the layout of external lighting is satisfactory. However, the document fails to make reference to Institute of Lighting/Bat Conservation Trust guidance <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. Institute of Lighting//Bat Conservation Trust guidance advises that 2700K or lower luminaire are used. However, we note that 3000K luminaire are proposed. We advise that an alternative light is used that accords with published guidance. We therefore maintain that the following condition be included within any permission: Condition - Prior to its installation, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include: • Details of the siting and type of external lighting to be used • Details of lighting to be used both during construction and/or operation • Measures to monitor light spillage once development is operational The lighting shall be installed and retained as approved during construction and/or operation. Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species and protected sites, habitats, commuting corridors. Provided the development is carried out in accordance with this condition, we do not consider that it will adversely affect the integrity of the 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 the 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

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result in an adverse effect upon the SAC.

Water Quality We acknowledge that the development will not be served by the public foul sewer and that the application form and supporting information indicates that foul drainage is to be discharged to a private sewerage system. The applicant has provided a suitable breakdown of the costs of connecting to sewer versus a private treatment plant, which shows an estimated £24k difference in cost in terms of capital costs. In terms of planning, the applicants have justified why connecting to the main sewer would not be suitable. In these circumstances Welsh Government Circular 008/2018 advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, in order to justify the use of private sewerage. The applicant has now clarified, within the document entitled “Response Welsh Water Letter dated 27th July 2021 as regards Water Quality” that a septic tank and soakaway system were investigated, but due to the poor drainage qualities of the land, a soakaway would not be suitable. We therefore accept that the applicants have followed the drainage hierarchy, and that a suitable drainage system is now proposed. We therefore do not have any further water quality concerns, but the applicants should note that they will require separate permission from NRW for the foul discharge to the watercourse, as below. The Applicant should be aware that to operate a private sewerage system, they will need to apply for an environmental permit or register an exemption with us. Septic tanks and small sewage treatment works may be registered as exempt from the requirement to obtain an environmental permit if certain criteria are met. Please note, should a permit be required, further information may be required as part of that application and the Applicant is therefore advised to hold pre-application discussions with our Permitting Team on 0300 065 3000, at the earliest opportunity, to try to ensure that there is no conflict between any planning permission granted and the permit requirements. It is important to note that a grant of planning permission does not guarantee that a permit will be granted, should a proposal be deemed to be unacceptable (either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible). The Applicant should ensure that they have all the required permissions, consents, permits and any other approvals in place prior to commencement of works on the site. More information, including a step by step guide to registering and the relevant application forms are available on our website. Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information. Flood Risk The site lies within Zone A of the Development Advice Maps (DAM) contained within Technical

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Advice Note 15 Development and Flood Risk (July 2004).

TAN15 advises that for development located in Zone A the justification test is not applicable and surface water requirements apply. The acceptability criteria are for no increase in flooding elsewhere to occur as a result of the development. Given the location of development in Zone A, we advise that surface water requirements should be assessed. We note it is for the Authority's Land Drainage Department to comment on the suitability of these proposals. 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 secure all other permits/consents/licences relevant to their development. Please refer to our website for further details. If you have any queries concerning the above, please contact me on the details below. Advice for the Developer: Environmental Management: As advised above, the private foul drainage system associated with this development will require an Environmental Permit under the Environmental Permitting Regulations 2016, from Natural Resources Wales, unless an exemption applies. The applicant is advised to contact Natural Resources Wales on 0300 065 3000 for further advice and to discuss the issues likely to be raised. The applicant should be aware that a permit may not be granted. Additional guidance on 'Environmental Permitting' can be accessed: <http://naturalresources.wales/permits-and-permissions/water-discharges/discharges-to-surface-water-and-groundwater/?lang=en> The applicants must minimise discolouration to the watercourse from the construction works. Silty water should be treated, either through the use of settlement lagoons, or tanks, or discharged across a grassed area. For work in river channels the use of coffer dams is recommended, to keep river water out of the working area. River crossings must be kept free from mud or dust deposits. Oil and chemical storage must be kept away from the watercourse, on an impervious base, within a bund, and secured. Absorbents or a suitable spill kit must be kept on site for use in the event of an emergency. NRW should be notified immediately of such an occurrence. The mixing, use and washing of machinery and shuttering of wet concrete and cement must be carefully controlled to minimise the risk of any material entering the watercourse. The applicant is advised to follow the guidance within Guidance for Pollution Prevention 5 "Works and maintenance in or near water": <http://www.netregs.org.uk/media/1415/gpp-5-works-and-maintenance-in-or-near-water.pdf> The demolition of the building will generate what is termed as controlled waste. This waste should only be disposed of to sites which can prove that they are registered

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as exempt, or licensed under the Environmental Permitting Regulations. There is a legal requirement (Duty of Care requirements of Section 34 the Environmental Protection Act 1990) on the site owner, demolition contractor etc to ensure that the re-use or disposal of this waste is appropriate and complies with the Environmental Permitting Regulations. The Duty of Care requirements also mean that appropriate Waste Transfer Notes are produced and kept. Inappropriate disposal will result in enforcement action being taken against all those involved in the disposal of the waste. We advise that in addition to planning permission, it is the applicant's responsibility to ensure that they secure all other permits/consents relevant to their development.

Welsh Water:

Comments 30/06/2021:

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development.

As the applicant intends utilising a private treatment works we would advise that the applicant contacts Natural Resources Wales who may have an input in the regulation of this method of drainage disposal.

However, should circumstances change and a connection to the public sewerage system/public sewerage treatment works is preferred we must be re-consulted on this application.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process we kindly request that we are re-consulted and reserve the right to make new representation.

Biodiversity

Latest comments 09/04/2026:

The applicant has submitted the following, received on 10th Dec 2025:

- Green Infrastructure Statement dated 1st March 2025.
- Layout Plan (block Plan)
- Planting Specification Proposed Indigenous Hedging
- BAT ACTIVITY ASSESSMENT by Ecoscope dated 08 December 2025
- Ecological Impact Assessment (EcIA) of land at Grafog Farm

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Holiday Park, Groeslon, by

Ecoscope dated 9th Dec 2025

Bats & Glynllifon SAC

The Glynllifon SAC is designated for its population of Lesser Horseshoe Bats. The SAC is located 30 meters to the west across the A487 road. Surveys by the applicant's ecologist has shown that Lesser Horseshoe use part of the existing hedgerow as a flight-line.

Under the Habitats Regulations 2017 Cyngor Gwynedd as the competent authority is required to undertake an HRA.

This development proposal to build a caravan park is likely to affect Lesser Horseshoe Bats for the following reasons:

1. Loss of foraging habitat.
2. Lighting resulting in barriers to bat flight paths.

The proposal seeks to mitigate the impacts to bats by planting a hedge to create a barrier to light spill as well as a foraging habitat and provide species rich grassland. Lighting can be reduced and light spill reduced by following the guidelines produced by BCT & ILP. Therefore it is likely that this development will not result in an adverse impact to the Lesser Horseshoe Bat population of Glynllifon.

In a letter from NRW dated 10th October 2023 they state that they are satisfied that lighting can be planning condition to ensure that it will not impact bat flight paths.

I am not satisfied with the landscaping and hedging therefore I would like a planning condition.

Biodiversity and Green Infrastructure Scheme

This development will result in the loss of 7,500 square meters of semi-improved grassland. This has not been avoided nor is it mitigated for. I recommend that the applicant manages an additional field as a traditional hay meadow to compensate for this loss.

Required planning conditions:

1. Before any construction takes place a lighting plan which has followed the BCT & ILP guidelines must be provided together with an illumination model showing lux contours within the site and the surrounds of the site to 10 meters. Lighting must not result in the illumination of dark areas shown in Bat Activity Assessment (Ecoscope 8th Dec 2025).
2. Before the site is operational monitoring of illumination levels and lighting must be provided to the LPA and any changes required to

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maintain dark areas for bat must be undertaken to the satisfaction of the LPA.

3. Before any construction takes place a suitable landscape plan must be provided showing the planting of hedges 2m wide and planted with a density of 8 trees per square meter using native local providence trees.

4. Before any works commence a Biodiversity Mitigation Plan must be provided for the loss of grassland habitat and this must include the management of a field as traditional meadow.

5. Before the site is operational biodiversity mitigation compliance audit must be provided and changes required to must be undertaken to the satisfaction of the LPA.

I am satisfied that impact of this development can be mitigated as long as this conditions are in place and followed, I have no objection.

Senior Rights of Way Officer Llandwrog public footpath number 58 will need to be protected during and after this development.

Licensing Enforcement Officer Comments 11.07.23

In addition to Licensing memo comments, dated 15-07-21 and 05-10-21, please see further comments:

The development will be subject to the following Legislation relating to Health and Safety, Fire Safety and Public Health provision as follows:

The Health and Safety at Work etc. Act 1974

The Caravan Sites and Control of Development Act 1960

1983 Model Standards - Touring Caravans / Tents The development must fully comply with licence conditions www.gwynedd.llyw.cymru/trwyddedcarafanau

Layout and order of caravans, awnings and cars The layout of cars with an awning on either side of the touring caravans is not acceptable. We want a plan showing a caravan + awning + car + 3 metres in width

Toilet facilities, washing, showers, disabled bathrooms. A number of showers have already been noted on the proposed plan. However, see the numbers of toilets and wash basins in green (supplementary document) needed to accommodate 35 units in total. We would like the scheme to show the number of toilets, wash basins, showers and a room for disabled provision within the plan.

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6. Application for a site Licence following planning approval Following any planning application that is granted in relation to a caravan or tent site under the 1960 & 1936 Acts, it will be necessary for the applicant to apply for a site licence and submit a detailed 1:500 scale plan of the site to the Licensing Service. To discuss further, contact the Licensing Enforcement Officer, Pollution Control and Licensing Service, Cyngor Gwynedd on 01766 771000 or licensing@gwynedd.llyw.cymru

In addition to Licensing comments memo dated 15-07-21 and 05-10-21, see further comments:

This development will be subject to the Legislation stated below relating to Health and Safety, Fire Safety and Public Health provisions as follows:

Health and Safety at Work etc Act 1974

The Caravan Sites and Control of Development Act 1960

Model Standards 1983 -Touring Caravans / Tents The development must comply fully with the licence conditions www.gwynedd.llyw.cymru/caravanlicence

Layout and Order of caravans, awning and car The installation of cars and awnings on each side of the touring caravans is not acceptable. A plan is required demonstrating caravan + awning + car + 3 meters wide 5. Toilet, washing facilities, showers, provision for disabled The number of showers has already been identified on the plan. However the number of toilets and wash basins demonstrated in green (document attached) is required to accommodate 35 units in total. We wish the plan to demonstrate the number of toilets, wash basins, showers and a room for disabled provision within the plan.

Application for a site Licence following planning approval Following any planning application that is granted in relation to a caravan or tent site under the 1960 & 1936 Acts, it will be necessary for the applicant to apply for a site license and submit a detailed 1:500 scale plan of the site to The Licensing Service. To discuss further, contact the Licensing Enforcement Officer, Pollution Control and Licensing Service, Gwynedd Council on 01766 771000 or licensing@gwynedd.llyw.cymru

Comments 25/09/23 :

I refer to additional information received dated 20-09-23 through a Planning Service consultation relating to light from The Biodiversity Service. The provision of low light will ensure the safety of members of the public getting around safely on the site. Health and Safety at Work etc. Act 1974 The Caravan Sites and Control of Development Act 1960.

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Comments 28.05.2026

I would like to confirm that the documents submitted by the applicant in response to the licensing officer's comments in 2021, 2022 and 2023 meet the requirements of the 1983 Model for Touring Sites standards.

The plan for the toilet and shower block does not show a hand-washing basin in the disabled toilet unit, and I would be grateful if the applicant confirms that there will be a hand-washing basin in this unit.

As the space between some of the Touring Units is likely to be around the minimum of 3 metres, it will be necessary to ensure that the space remains clear when the site is operational.

Land Drainage Unit

Since 7 January 2019, sustainable drainage systems (SuDS) are needed to control surface water for every new development of more than 1 house or where the construction area with drainage implications is 100m² or more. Drainage systems must be designed and constructed in accordance with the minimum standards for sustainable drainage as published by Welsh Ministers.

These systems must be approved by Cyngor Gwynedd in its role as SuDS Approval Body (SAB) prior to commencement of the construction work.

Due to the size and nature of the development, it is likely that an application will need to be provided to the SDS Approval Body for approval before construction work commences. It appears that the developer intends to drain the site in a suitable sustainable manner; however, until an application is made to the SAB, there is no certainty that the site plan would enable compliance with the full suite of national SuDS standards. Early consultation with the SAB is recommended.

Chief Fire Officer

In connection with your above consultation, the Fire Authority has no comments to make regarding access to Fire vehicles and water supply.

The Welsh Government's
Transportation Unit

I refer to your consultation regarding the above planning application and advise that the Welsh Government as highway authority for the A487 trunk road directs that any permission granted by your authority shall include the following conditions:

1) Prior to any construction works or the site being used as per the approved planning application, the developer must gain written

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approval of the detailed construction drawings and associated documents for the access improvements works. The approved construction works must be completed and in full, outside of the trunk road embargo period, prior to the development being first used by the public.

2) Construction Site & Traffic Management Plan (CSTMP) shall be submitted and approved in writing by the Local Authority, in consultation with Welsh Government, prior to the commencement of any site works including demolition. The CSTMP scope must be agreed with the Local Authority prior to its development. The approved CSTMP, shall be implemented as agreed in writing with the Local Authority, prior to the commencement of any site works. The CSTMP must include (as a minimum): a. Site compound location details; b. On-site parking provisions for construction personnel; c. Scheduling and timing of deliveries taking account of WG highway embargo periods; d. Loading and unloading proposals/method statements; e. Travel Management Plan;

f. Details of on-site wheel washing facilities and/or positive measures to ensure no mud or debris amasses on any part of any vehicle connected with the development which could then be deposited on the public highway; g. Cleansing proposals of the Public Highways due to the development (if applicable); h. Storage of plant and material used in constructing the development; i. Temporary lighting proposals to ensure that Illumination gear from any lighting source is not visible to motorists using the public highways; j. Bilingual (Welsh above English) traffic management signs schedule and location plan (to The Traffic Signs Manual and The Traffic Signs Regulations & General Directions specifications).

3) Internal accommodation works detailed on the approved drawings must be completed in full with all bilingual signage installed prior to the development being brought into use. Installed signage must thereafter be forever maintained.

4) No gates shall be permitted within 25m of the trunk road carriageway, any installed gate must not open outwards towards the trunk road.

The following are informatives that the developer must be made aware of: i. Highway work required, within the public highway, to facilitate the proposed development will be subject to a Section 278 agreement which must be sealed prior to the commencement of any site works. As a minimum the design package/agreement must adequately detail the below listed requirement [Details of Section 278 agreement process, fees and time scales can be acquired by requesting relevant information from the email streetworks@nmwtra.org.uk]: a. Detail design of access to Design Manual for Roads and Bridges (DMRB) specification; b. Detail design of accommodation works

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required to street furniture such as signs, light columns, feeder pillars, bus stop assets, benches, waste bins, fences, etc.; c. Detail design of alterations required to public highway surface water drainage to ensure completed scheme adheres to all relevant design requirements (no gullies in bell mouth area of new access etc.); d. Resurfacing works to the public highway; e. Alterations to kerbs and edgings; f. Road mark and traffic sign works; ii. The applicant should note that planning permission does not constitute permission under the Highways Act for various activities that may be associated with the development i.e. use of the highway/footway to, for example: deposit material, deposit skips, erect scaffolding, any excavation within the highway or the provision of traffic management. Such activities will require the separate consent of the Highway Authority for which you should contact the StreetWorks department on streetworks@nmwtra.org.uk and the relevant Local Authority for further information. iii. It is an offence to allow mud, stones, soil, rubbish or other matter to fall, be carried, or washed onto a highway. The applicant must ensure that positive preventative measures are provided within the curtilage of the site/property and is responsible for making arrangements for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway. These measures shall thereafter be suitably maintained. Failure regarding the above may result in the Highway Authority serving legal notice. iv. Any temporary traffic management arrangements required in connection with this application shall be in accordance with Chapter 8 of the Traffic Signs Manual and New Roads and StreetWorks Act 1991, with all signs being bilingual Welsh above English, and shall be approved by the highway authority. For further information please contact streetworks@nmwtra.org.uk and the relevant Local Authority for further information. v. Note: a desk top study suggests that camping signage and associated posts are located within the verge, if these are located outside the development or within the public highway verge (adopted highway) the owner must remove all elements with immediate effect.

The above conditions are included to maintain the safety and free flow of trunk road traffic. We can confirm that our direction is based on the information detailed in the “Transport Technical Note” dated “December 2023 Revision P01”, which notes 25 touring caravans and 10 tents in total.

Public Consultation:

A notice was posted on the site and nearby residents were notified. No response to the consultation was received.

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5. Assessment of the material planning considerations:

The principle of the development

- 5.1 As this is a site for touring caravans, the application must be considered under Policy TWR 5 of the Anglesey and Gwynedd Joint Local Development Plan (LDP) that sets out a series of criteria to approve such developments. It is noted that although there is a certified site existing on the site, this does not amount to planning permission, and because this proposal goes beyond the requirements of the certificate on the site, all development requires planning permission and is the subject of the application in question.
- 5.2 Criterion 1 in policy TWR 5 states that any new touring caravan developments should be of a high-quality in terms of design, layout and appearance, and well-screened by existing landscape features and / or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape.
- 5.3 The proposal would be located in a level field with mature trees at the boundaries and therefore hidden from public vantage points. The proposal includes retaining the existing hedge within the site and reinforcing the screening by proposing the planting of a new native hedge around the site to separate the caravan pitch from the wider field. There will also be a managed wildflower meadow behind the hedge in the rest of the field. The site is not within a Special Landscape Area and it is not believed that the development would cause significant damage to the quality of the landscape. The proposal is designed to meet the requirements of the licence in terms of space and facilities and therefore it is accepted that the development is up to standard.
- 5.4 Policy PCYFF 4 of the LDP requires that every proposal should assimilate with their surroundings and will refuse proposals that do not show how consideration has been given to landscaping matters from the outset as part of the design proposal. It is noted that there is currently a site for five caravans and ten tents, which has been certified by the 'Camping and Caravanning Club'. Nevertheless, this site is being assessed as a new site. It is believed that the choice of location and additional landscaping proposed also meet with the objectives of this policy.
- 5.5 The second criterion of Policy TWR 5 asks to avoid excessive areas of hard standing. The hard surfaces proposed for the caravan plots have now been removed, and the track around the site has been revised to a permeable surface that allows the grass to grow through (cellular grass reinforcement). This will ensure that the site continues to appear as an agricultural site during the winter months. As hard pitches are not shown, it is believed that it would be appropriate to impose a condition that any hard pitches be limited to caravan pitches only, and that their finish needs to be agreed.
- 5.6 The third criterion requires assurance that the site will only be used by touring units – this can be managed through an appropriate planning condition.
- 5.7 The fourth criterion requires assurance that any ancillary facilities should be located in an existing building, or should this not be possible, that any new facility is commensurate to the scale of the development. It is noted that there is currently a toilet and shower block on site and the proposal involves demolishing that building and replacing it with a higher standard modular facilities building. This is a touring unit which will be transported to the caravan site, but will remain in place during the closed season. The building would have a moderate floor area of 36m² and provides the basic facilities requirements in line with site permit requirements for a caravan development of the size proposed as part of these proposals. It is considered that the facilities are

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appropriate for the development in question and respect the context of the site and its position in the landscape. The proposal therefore satisfies criterion 4 of TWR 5 as well as policy PCYFF 3 of the LDP.

- 5.8 Under the fifth criterion, the policy requires the site to be located close to the main road network and that adequate access can be provided without significantly harming landscape features – highways matters are discussed further below, but in essence, the proposal is considered acceptable in relation to this criterion.
- 5.9 The sixth criterion requires assurance that occupancy is restricted to holiday use only - this can be ensured with a suitable planning condition.
- 5.10 The seventh, and the last of the criteria, requires assurance that the site is used for touring purposes only and that the units are removed from the site during periods when not in use - again, this is a matter of imposing a suitable planning condition.
- 5.11 Overall therefore, it is believed that this proposal meets the requirements of the criteria set by Policy TWR 5 and the policy requirements of PCYFF 3 in the LDP.
- 5.12 It was noted that concerns about the cumulative impact have been raised in recent Committees. The area in question is not considered an example of a location that is under immense pressure in terms of such tourism developments. Unlike Policy TWR 3, which concerns touring caravan and chalet sites and permanent alternative camping accommodation, the cumulative impact in the criteria of policy TWR 5 is not a consideration as touring use is temporary with less impact than static structures. However, the criteria themselves responded to the cumulative impact in the sense that sites in obtrusive places that are not close to the main roads network should not be permitted. Even during the winter months, it is considered that the site is well-screened by the existing landscape features and should the application be approved it is proposed to add more screening. In paragraph 6.3.81 of the policy, it states that caravans should not be permitted in open settings near the coast or in Areas of Outstanding Natural Beauty. The site is located away from an open coastal location and there is no landscape designation in the vicinity.

General and residential amenities

- 5.13 Access to the site is located directly off the A487 Trunk Road, opposite Inigo Jones Slate Works. The nearest property is about 250m away, across fields from the existing caravan site. Views from the public highway are limited, and the site is not prominent in main views, due to the difference in levels and the existing extensive landscaping planted as part of improvements to the A487. In addition, the site is effectively screened by existing trees and *clawdd* along the northern and eastern peripheries. Based on the distance and concealed nature of the site, it is not considered that the proposal would have a significant adverse effect on any nearby residents. It is considered that the proposal is acceptable in terms of Policy PCYFF 2 of the LDP that deals with protecting the amenities of nearby land users.

Transport and access matters

- 5.14 The site is dependent on direct access off the A487 Trunk Road. As part of the proposal, it is planned to carry out improvement works to the junction to enable two vehicles to pass each other when joining or exiting the trunk road. Signs are also proposed to warn road users of the presence of the junction and speed limit. This will facilitate the free flow of traffic onto the trunk road. In addition, a sign is proposed to warn vehicle users that pedestrians may be present, with the aim of protecting pedestrians using the Public Right of Way.

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- 5.15 Observations were received from the Highways Unit that the Welsh Government's Trunk Roads Unit should be consulted for comments on transport matters.
- 5.16 An objection was originally received from the Welsh Government's Trunk Roads Unit as there was insufficient information on the application. There was concern that the existing junction was narrowing to approximately 3-4m within 7m of the junction. This could lead to a situation where vehicles wishing to turn off the A487 into the camping and caravan site have to stop altogether on the trunk road while another caravan leaves the site, which could potentially lead to vehicle collisions on the trunk road. Additional information was therefore requested.
- 5.17 During the application period, there have been several correspondences between the Planning Authority, the applicant and the Welsh Government's Trunk Roads Unit, and additional plans as well as reports have been received to overcome their concerns.
- 5.18 As part of the planning application, the Welsh Government (WG), namely the North and Mid Wales Trunk Road Agency (NMWTRA), has requested the provision of an assessment of the proposed improvement works to the junction between the development site and the A487, to assess its compliance with DMRB CD 123 and other relevant highway standards. This requirement stems from the increase in traffic flows identified as a result of the proposed development. A Transport Technical Note was received, dated December 2023 (amendment P01).
- 5.19 The Welsh Government's Trunk Roads Unit's most recent comments, dated 28/01/26, state that their guidance is based on the information provided in the "Transport Technical Note" document dated December 2023 (Amendment P01). The comments also state that any permission granted should be subject to certain conditions, as outlined in the advice submitted. It is therefore considered with the appropriate conditions that this proposal is acceptable in terms of the safety of the trunk road.
- 5.20 Based on the above, in addition to what is being proposed in the application and the planning conditions to ensure road safety, it is therefore considered that the proposal is acceptable in terms of policies TRA 2 and TRA 4 of the LDP. The proposal also satisfies the requirements of criterion 5 of policy TWR 5 as it is close to the main highway network and adequate access can be provided without significantly harming landscape characteristics and features.

Biodiversity matters

- 5.21 The proposed caravan site is located within the Llain Ffynnon Wildlife Site, and approximately 25m from the Glynllifon Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), which has been designated due to its population of bats. Cyngor Gwynedd is the competent authority under the 2017 Habitats Regulations, and has a duty to consider any likely significant impacts on Special Areas of Conservation and Special Protection Areas.
- 5.22 During the period of this application, several responses have been received from the Biodiversity Officer and Natural Resources Wales in relation to the protected sites and bat-related matters. Further information has been received from the applicant to respond to the concerns about the impact on bats. Those documents include:
- Green Infrastructure Statement, dated 1 March 2025
 - Layout Plan (Block Plan)
 - Planting Specification – Proposed Native Hedges
 - Bat Activity Assessment from Ecoscope, dated 8 December 2025

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- Ecological Impact Assessment (EcIA) of land at Fferm Grafog Holiday Park, Groeslon, by Eco-scope, dated 9 December 2025.
- 5.23 Surveys by the applicant's ecologist have shown that Lesser Horseshoe Bats are using part of the existing *clawdd* on the site as a flight path.
- 5.24 As the Competent Authority under the Conservation of Habitats and Species Regulations 2017, the Council, before deciding to give consent for a project which is likely to have a significant impact on the SAC, either alone or in combination with other plans or projects, must consider any likely significant impacts on Special Areas of Conservation and Special Protection Areas.
- 5.25 This proposal seeks to mitigate the impact on bats by planting a hedge to create a barrier to light spills, as well as creating a feeding habitat and providing a species-rich grassland. The lighting and light spill can be reduced by following the guidelines produced by BCT and ILP.
- 5.26 A letter from Natural Resources Wales dated 10 October 2023, states that they are satisfied that the lighting can be controlled by a planning condition to ensure that it will not affect bat flight paths. Therefore, in accordance with the information submitted together with conditions to ensure their completion, this proposal is not considered to have an additional or adverse effect on the population of Glynllifon Lesser Horseshoe Bats, and would result in a neutral position for the Glynllifon Special Area of Conservation.
- 5.27 Concerns were received in the Biodiversity Officer's comments in 2023 regarding the site plan, which shows an attenuation pond in the south-western corner of the site. This area contains wet grassland of ecological interest, and therefore the location of this pond would likely harm the existing habitat. As a result, it is recommended to either remove the pond from the plans or relocate the pond to the eastern side of the site. A revised plan has been submitted by the applicant showing a new location for the Pond (block plan dated 24/10/2023) and this plan has been approved by the Biodiversity Officer.
- 5.28 As a result of this development, an area of grassland currently used for horse grazing is lost. It is therefore important that Biodiversity mitigation measures are proposed. A Green Infrastructure Statement was received with this application in addition to the other Ecological Reports that had been provided.
- 5.29 This Green Infrastructure Statement proposes mitigation measures for the loss, including significant landscaping and tree planting. All lighting around the site will be kept at a low level to ensure that there is no impact on bats, and will be designed in accordance with Guidance Note 8: Bats and Artificial Lighting. A basic lighting plan will also be provided.
- 5.30 Although mitigation measures have been proposed, further observations were received from the Biodiversity Officer stating that further improvements were needed to mitigate the impact of the development, and further conditions were proposed. Subject to those conditions, there is no objection to the application.
- 5.31 By ensuring that appropriate conditions are imposed, it is considered that this development will comply with the requirements of Policies PS19, AMG 5 and AMG 6 of the LDP, together with the Regulations for Conservation of Habitats and Species 2017 (as amended) and Chapter 6 of Planning Policy Wales, which encourages proposals to protect, enhance the area's biodiversity and ensure that there is no detrimental impact on internationally protected sites and ensure biodiversity improvements and use of a phased approach.

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Drainage and Flooding Matters

- 5.32 The Flood Map for Planning notes that the site is within a Surface Water Flood zone and Small Watercourses 2 and 3. Since submitting the application, the Welsh Government has published a revised TAN 15 on 31 March 2025. The title of the revised TAN 15 is 'Development, flooding and coastal erosion' and it corresponds with Circular 002/2025 'Guidance on the Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) 2025' and a clarification letter from the Welsh Government Planning Directorate's Chief Planner.
- 5.33 Section 1 of the new TAN 15 states "This document replaces Technical Advice Note 14, published in 1998 and Technical Advice Note 15, published in 2004. Development Plans and planning decisions should no longer refer to those documents."
- 5.34 However, the clarification letter states that "...the publication of new guidance could have an impact on the processing of planning applications therefore there will be a transitional period for the implementation of the TAN. Planning applications submitted and registered before the new TAN was published will continue to be assessed against the previous version...". Therefore, official guidance from the Welsh Government for planning applications submitted and registered before 31 March 2025 are to be assessed for flood risk on the content of the 1st edition of the TAN 15 policy published in 2004.
- 5.35 Natural Resources Wales' observations, dated 10/10/23, note that the site is within Zone A on Development Advice Maps (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (July 2004). TAN 15 advises that the justification test is irrelevant for a development located in Zone A, and that surface water requirements apply. The acceptability criteria are that no increased flooding will occur in other places as a result of the development.
- 5.36 Comments were received from the Drainage Unit stating that due to the size and nature of the development, an application will need to be provided to the SuDS Approval Body for approval before construction work commences. It appears that the developer intends to drain the site in a suitable sustainable manner; however, until an application is made to the SAB, there is no certainty that the site plan would enable compliance with the full suite of national SuDS standards. A note may be placed on any permission granted drawing the applicant's attention to this requirement.
- 5.37 As the development intends to use an alternative method of drainage of the main sewer, advice was received from Welsh Water that the applicant should seek guidance from Natural Resources Wales, as that body is responsible for regulating and approving alternative drainage methods. Natural Resources Wales' initial comments are acknowledged that the development will not be served by the public sewer, and that the application form and supporting information state that foul water will be discharged into a private sewerage system. The applicant has provided a suitable breakdown of costs associated with connecting to the public sewer compared to private treatment works, and has justified why connecting to the main sewer would not be a suitable option.
- 5.38 In these circumstances, Welsh Government Circular 008/2018 advises that a full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the circular to justify the use of a private sewerage system. Initially, insufficient information had been provided to demonstrate that the drainage hierarchy had been followed appropriately. The application did not provide sufficient grounds for being able to carry out an assessment of the pollution risks to the aquatic environment that may arise from the proposed development. Given the seasonal nature of the development, such as a caravan and camping site with a varying drainage load, a septic tank leaking into the ground would be preferred over discharge from a treatment plant to a watercourse.

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- 5.39 The applicant has provided further clarification within the document 'Response Welsh Water Letter dated 27th July 2021 as regards Water Quality', confirming that the option of a septic tank and a soakaway has been considered. However, due to the poor drainage characteristics of the land, it was concluded that a soakaway system would not be suitable on this site.
- 5.40 Therefore, Natural Resources accepts that the applicant has followed the drainage hierarchy appropriately, and that a suitable drainage system is now proposed. As a result, no further concerns arise in terms of water quality. However, it should be noted that the applicant will need to obtain separate permission from Natural Resources Wales (NRW) for the discharge of foul water into the watercourse. The details are set out in their comments and a Note may be imposed on any permission granted to draw the applicant's attention to the requirements.
- 5.41 On the basis of the above, the proposal is considered acceptable and complies with the requirements of policy PS6 of the LDP together with Technical Advice Note 15: Development and Flood Risk (2004).

Sustainability matters

- 5.42 Policy PS 5 (Sustainable Developments) supports developments which are consistent with 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 4" (Bullet point 12, Policy PS 5)." This is supported by bullet point 4 of Policy PS 14 (The Visitor Economy).
- 5.43 It is considered that the policies of the LDP are consistent with national planning policies in terms of how it deals with sustainable development principles.
- 5.44 Although it is recognised that users of the touring units would use private vehicles to reach the site (due to the need to tow a caravan) there are various alternative transport options available once they reach the site, including cycling, public transport and on foot.
- 5.45 The site is situated in a very favourable position in terms of sustainability, with direct access off the A487 Trunk Road. In addition, the site is well positioned for sustainable travel to and from several important attractions; for example, Caernarfon is easily accessible by bus and offers a wide range of activities, attractions, places to eat and places of interest for visitors. The Planning Statement (dated June 2023) states that a public footpath links the application site to Groeslon, with access to bus stops within a walking distance of approximately 15 to 20 minutes. In the context of all the relevant material planning considerations, it is considered that the location of the site is sustainable and acceptable in relation to the requirements of policies PS4, PS5 and PS14 of the LDP, and complies with the advice included in TAN 18 and PPW.

Language Matters

- 5.46 In accordance with the Planning (Wales) Act 2015, it is a duty when making a decision on a planning application to consider the Welsh language, where it is relevant. This is reiterated further in para 3.28 of Planning Policy Wales (Edition 11, 2019), along 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 it is expected for Welsh language considerations to be incorporated in each relevant development. This proposal

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does not reach the thresholds to submit a Welsh Language Statement or a Report on a Welsh Language Impact Assessment; however, the guidance included within Appendix 5 notes that every retail, commercial or industrial development where there is no need to submit a Welsh Language Impact Statement/Assessment should show how consideration has been given to the language.

5.47 A document was submitted to support the application explaining how the Welsh language was considered when formulating this plan, noting the following points:

- The use of the caravan site will be for holiday purposes only; visitors will only stay for relatively short periods.
- The proposed development will contribute directly and indirectly to the maintenance and strengthening of the local economy by providing employment and spending opportunities in the local economy. The proposal will involve an investment of around £100,000 in the development of the proposed caravan site. Local supply chains will be used where possible, and it is anticipated that all contractors will be local.
- The applicants live in the property and currently operate the current Certified Caravan and Camping Site on a part-time basis, while both are in full-time employment elsewhere. It is envisaged that, on a conservative basis, the development of the caravan site will enable one, and possibly both, to work full-time running the site.
- The site is within walking distance of Groeslon, which has been designated as a local village under the Anglesey and Gwynedd Joint Local Development Plan. Visitors to the caravan site will be able to use the facilities available in Groeslon, including the café/shop (Gerlan Farm Café and Shop) and the pub. This will contribute to the maintenance and improvement of these facilities for the benefit of visitors and the local community.
- The proposed caravan site is close to a number of tourist attractions, in particular the Inigo Jones Slate Works. The provision of additional capacity will contribute to the maintenance and enhancement of these attractions, with associated economic benefits. A list of tourist attractions in the area will be provided to visitors to the site.
- Positive mitigation measures will be part of the proposals, namely the retention and promotion of the current Welsh name (Grafog). Bilingual signage will be provided across the caravan site, and the information given to visitors will include details of the history and culture of the area.

5.48 It is considered that sufficient information has been submitted to meet the requirements of policy PS 1 and the SPG in terms of demonstrating that due consideration has been given to the Welsh language in drawing up this plan.

6. Conclusions:

6.1 Having considered the assessment above and all the relevant planning matters including the local and national policies and guidance, as well as the observations received, it is believed that the proposal is acceptable based on the matters noted in the report and that it would not have a substantial impact on the landscape, amenities of the local neighbourhood, biodiversity, language or road safety.

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7. Recommendation:

7.1 To approve subject to conditions

1. Time
2. In accordance with the amended plans
3. Limit the number of touring units to 25 caravans and 10 tents only
4. Holiday use only and keep a register
5. Touring unit's holiday season - 1 March to 31 October.
6. No storing of touring caravans on the site
7. Trunk Road Conditions
8. Natural Resources lighting condition
9. Biodiversity Conditions
10. Construction work hours
11. Welsh name
12. Welsh language Signs
13. Hard-standing condition
14. Footpaths Condition

Notes:

NRW letter note

SUDS note

Licensing Note