

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 3

Application Number: C25/0273/04/LL

Date Registered: 07/05/2026

Application Type: Full

Community: Llandderfel

Ward: Llandderfel

Proposal: Erection of eight shepherds' huts, installation of foul water container and water soakaway and infrastructure to serve the shepherds' huts.

Location: Palé Hall Hotel, Llandderfel, Bala, Gwynedd, LL23 7PS

Summary of the Recommendation: TO REFUSE

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

1. Description:

- 1.1 This is an application to erect eight shepherds' huts, installation of foul water container and soak-away to serve the huts and to support the existing hotel business. The proposed siting would include locating 3 shepherds huts in the north of the site (Site A), which is located nearest to the hotel and another 5 shepherds' huts situated to the south-west (Site B) around an existing small lake. The original proposal consisted of 10 shepherds' huts, but the application and the description were subsequently amended, and the number of shepherds' huts were reduced from 10 to 8 units.
- 1.2 The application site is located south-west of the main Palé Hall Hotel building within the gardens and is surrounded on each side by mature trees. Palé Hall Hotel is a substantial Grade II* Victorian country house, together with the associated outbuildings within its curtilage, and is located prominently on the main lawn, the Hotel looks out over the garden, which is mainly a traditional design with extensive lawns, mature trees and paths. The garden contributes substantially to the property's character.
- 1.3 The site is in Dyffryn Dyfrdwy near the Eryri National Park, about 1km south of Llandderfel and 5.5km east of Bala, outside any development boundaries and therefore it is in open countryside as shown in the Anglesey and Gwynedd Joint Local Development Plan (LDP) Inset Maps.
- 1.4 The application site is located within the Dyffryn Dyfrdwy Historic Landscape as well as the Bala Countryside Special Landscape Area.
- 1.5 The site is located within the Afon Dyfrdwy and Llyn Tegid Phosphorus Special Area of Conservation (SAC). Afon Dyfrdwy is approximately 220m west of the site and is designated as a Site of Special Scientific Interest (SSSI).
- 1.6 The site is partially located within a C2 and C3 Flood Zone for surface water and small water-courses, as noted by the 'Flood Map for Planning'.
- 1.7 The entire site is within a Tree Preservation Order - Palé Parkland, Llandderfel partially located within the Wern Dywyll Wildlife Site. The site is served by the B4402 class II road, approximately 80m to the east.
- 1.8 The application is submitted to the Committee as the site is larger in size than what can be determined under the delegated procedure.
- 1.9 The following documents were submitted to support the application:
 - Application Form
 - Planning Statement, including a Visual Assessment and Design and Access Statement
 - Proposed Location Plan of the Site
 - Proposed Siting Plan of the Site
 - Proposed Elevations
 - Topographic Survey
 - Preliminary Ecological Evaluation, May 2025
 - Sheltered Habitats Regulations Assessment, dated February 2026
 - Arboriculture Assessment, dated 1 April 2025
 - Appendix to Forestry Assessment, 29 May 2025
 - Green Infrastructure Statement - March 2025
 - Foul Sewage Assessment

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

- Landscape and Visual Appraisal
- Heritage Impact Assessment
- Supporting Economic Report
- Statement of Profit and Loss for the last 12 months ending in March 2025 (CONFIDENTIAL)
- Response to observations from Consultees
- Response to CADW observations

1.10 Additional information was received in the form of dated e-mail 20/07/26 which corrects an error in the Supplementary Planning Statement regarding the size of the shepherds' huts; their proposed size is 7m long, 2.75m wide and 4m high and the Elevation Plans of the shepherds' huts reflect these measurements.

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 (Wales) Act 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

PS 2: Infrastructure and Developer Contributions

TRA 4: Managing transport impacts

PS 5: Sustainable development

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

PCYFF 2: Development Criteria

PCYFF 3: Design and Place Shaping

PCYFF 4: Design and Landscaping

PS 14: The Visitor Economy

TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Holiday Accommodation

PS 19: Conserve and where appropriate enhance the natural environment

AMG 2: Special Landscape Areas

AMG 3: Protecting and improving features and qualities that are unique to the character of the local landscape

AMG 5: Local biodiversity conservation

AMG 6: Protection sites of local or regional significance

AT 1: Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens

PS20: Preserving and where appropriate enhancing heritage assets

Supplementary Planning Guidance: 'Tourist Facilities and Accommodation'

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

National Policies:

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 11 - February 2021)

Technical Advice Note (TAN) 13: Tourism

Technical Advice Note (TAN) 18: Transportation

Technical Advice Note 24: The Historic Environment

3. Relevant Planning History:

3.1 Planning Applications

C05M/0151/04/LL – Remove condition 2 on planning permission ref: 5/19/47 Dated 22 May 1980 which noted that no part of the building could be used as a casino, music hall or dance hall - Granted with conditions - 14/11/2005

C06M/0107/04/LL – Remove condition 2 on planning permission ref: C05M/0151/04/LL which states that only entrance 'B' should be used (Nearest to Bryntirion Inn) to exit, and access 'A' for access only - Granted with conditions - 28/07/2006.

C10M/0074/04/LL - Conversion of outbuildings into a living unit as accommodation for manager and staff (2 habitable units) and three holiday units and erection of garage/storeroom. - Granted with conditions - Granted with conditions - 24/02/2011.

C10M/0075/04/CR - Conversion of outbuildings into a living unit as accommodation for manager and staff (2 habitable units) and three holiday units and erection of garage/storeroom. - Granted with conditions - 24/02/2011.

C13/0361/04/LL – Erection of wooden cabin for staff accommodation - Refused - 31/10/2013.

C15/1232/04/CR - Revised application for permission for C10M/0075/04/CR to convert and extend outbuilding A as a unit for managers' accommodation - Granted with conditions - 14/04/2016

C15/1298/04/LL - Revised application to permission C10M/0075/04/CR to convert and extend outbuilding A as a unit for managers' accommodation - Granted with conditions - 22/04/2016.

C16/0061/04/CR – Internal adaptations to 3 bedrooms - Granted with conditions - 14/04/2016.

C19/0876/04/CR - Conversion of outbuilding into 2 servicing units as part of the hotel - Granted with conditions - 21/11/2019.

C19/0874/04/LL - Conversion of outbuilding into 2 servicing units as part of the hotel - Granted with conditions - 04/12/2019

C25/0068/04/CR – Erection of a single-storey extension at the back of the building - Granted with conditions - 21/07/2026.

C25/0069/04/LL - Erect a new single-storey extension at the back of the building and landscaping work - Not determined.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

4. Consultations:

Llandderfel Community Council

The following planning application was discussed at our meeting this evening and it was agreed to object it. Like the previously submitted application, councillors were of the view that the plan was an over-development of the site, particularly as it is close to a unique listed building.

Transportation Unit:

I refer to the application above and confirm that the transport unit has no objection.

Welsh Water:

We refer to your planning consultation relating to the above site, and we can provide the following comments in respect to the proposed development. Since the proposal intends utilising an alternative to mains drainage we would advise that the applicant seek advice from Natural Resources Wales and or the Local Authority Building Control Department / Approved Building Inspector as both are responsible to regulate alternative methods of drainage. 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. We would request that if you are minded to grant Planning Consent for the above development that the Advisory Notes provided below are included within the consent to ensure no detriment to existing residents or the environment and to Dŵr Cymru Welsh Water's assets.

Advisory Notes

The planning permission hereby granted does not extend any rights to carry out any works to the public water supply system without first having obtained the necessary permissions required by the Water industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new connections team on 0800 917 2652 for further information on water connections. As of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. The development may therefore require approval of Sustainable Drainage Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.

Dŵr Cymru/Welsh Water is owned by Glas Cymru – a not-for-profit company. We welcome correspondence in Welsh and English Dŵr Cymru Cyf, a limited company registered in Wales no 2366777. Registered office: Pentwyn Road, Nelson, Treharris, Mid Glamorgan

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

CF46 6LY. Systems (SuDS) features, from the determining SuDS Approval Body (SAB), in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption. We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements. Dŵr Cymru Welsh Water is not responsible for fire protection or for providing suitable fire flows. Providing fire flows and fire protection are the responsibility of the appropriate regional Fire Services. We refer you to the 3rd Edition of the National Guidance Document on the Provision of Water for Fire Fighting published by the Local Government Association and Water UK. 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.

Natural Resources Wales

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the additional information regarding the above, which we received on 05 June 2026.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected sites and protected species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Sites

Foul Drainage

We provide our advice below to your Authority with respect to the proposed planning application. As you will be aware, the foul drainage discharge may need a variation to the Environmental Permit from NRW. We strongly advise the applicant to contact NRW's Permitting Service for further advice in this regard, to try to ensure that there is no conflict between any planning permission granted and the permit requirements.

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation (28 June 2024), under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note that the revised proposal seeks to replace the existing septic tank with a package treatment plant (PTP) serving both the hotel and proposed huts, with treated effluent discharged to ground via an extended drainage field. The applicant identifies a reduction in phosphate loading (from approximately 67.37kg TP/year to 36.98kg TP/year) and relies on infiltration to ground to conclude that there will be no pathway to the River Dee and Bala Lake SAC. However, the submitted information does not provide sufficient hydrogeological or pathway analysis to substantiate this assumption.

Given the site's proximity to sensitive receptors, including the River Dee and Bala Lake SAC and nearby surface water features, and the acknowledged ecological connectivity identified within the Shadow HRA (SHRA) (Turnstone Ecology, dated February 2026), a pathway to controlled waters cannot be ruled out based on the evidence provided. We therefore advise that a groundwater risk assessment is provided which considers site conditions (such as proximity to adjacent drainage fields, soil type, depth to groundwater, distance to surface water features and SAC boundary etc.) to determine with certainty that existing and proposed drainage fields will operate effectively in the future and prevent nutrients from entering the river. The applicant may wish to refer to advice on groundwater risk assessments to inform any technical assessments (Groundwater risk assessment for environmental permits). We also advise that the extension to the drainage field, as explained in the Foul Drainage Assessment (Geosmart, 10/10/2025) should be clearly shown on the site layout and location plan submitted in support of the application. The SHRA identifies credible impact pathways, including water quality effects, but reaches a conclusion of 'no likely' significant effect by relying on mitigation measures and unsubstantiated assumptions regarding the absence of connectivity. In accordance with the Habitats Regulations, such mitigation cannot be relied upon at the screening stage.

The proposal represents a material change to the existing drainage arrangements, including increased flows and a combined treatment system, and it is likely that the current Environmental permit will require variation.

We refer you to our Planning Advice referenced above, particularly the section titled 'What does this mean for development proposals involving private sewage treatment systems', and 'Can phosphorus reduction technology be used in private sewage treatment systems?' Ultimately, the suitability of foul drainage arrangements for the proposed development is a matter for your Authority to determine.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

We therefore advise you to take the above into account in your determination of whether the development is likely to have a significant effect on the SAC. Should you determine that an Appropriate Assessment is required, the Applicant will then need to submit whatever evidence they deem appropriate (seeking advice from consultants as may be necessary) to demonstrate no adverse effect on site integrity.

We strongly advise the applicant make use of our pre-application advice service prior to applying for an Environmental Permit, 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.

Otter

Otter (*Lutra lutra*) is a qualifying feature of the River Dee and Bala Lake SAC. The submitted Preliminary Ecological Appraisal (PEA) records evidence of otter activity, with spraint identified on stones around the on-site pond during a 2025 survey. This confirms use of the site by otter.

The PEA notes that the pond provides foraging habitat and that this use is likely associated with the River Dee population, located approximately 200–250m from the site. This indicates a functional connection between the development site and the SAC. The Shadow HRA identifies potential impact pathways including disturbance (lighting, noise and increased human activity), as well as risks to supporting habitat through pollution and changes in site use. Despite this, it concludes that no likely significant effect would arise, relying on the implementation of mitigation measures.

In accordance with the Habitats Regulations, mitigation measures cannot be relied upon at the screening stage to exclude likely significant effects. Accordingly, an Appropriate Assessment must be undertaken.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Given:

- the confirmed presence of otter on site;
- the functional connectivity between the site and the River Dee and Bala Lake SAC; and
- the identified pathways for disturbance and degradation of supporting habitat (e.g. through pollution);

it is not possible to exclude likely significant effects on this qualifying feature on the basis of the information provided.

To secure appropriate mitigation measures to ensure that otters are not disturbed during construction, we therefore advise the following condition is included in any permission.

Condition:

No development or phase of development 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:

- 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; invasive species management; species and habitats protection, avoidance 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.
- 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 preparation and construction phases of the development.

Justification:

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

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 site, 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/SPA/Ramsar site.

Site of Special Scientific Interest

NRW consider the proposals have the potential to impact upon the River Dee SSSI. Providing the impact pathways referenced above for the SAC are adequately addressed, NRW consider the features of the SSSI will also be adequately safeguarded

Protected Species

Otter

Please see our comments above in Protected Sites section.

Bats

The submitted PEA has identified that the site and surrounding habitats provide suitable foraging and commuting habitat for bats, including woodland, grassland and the on-site pond, and bats are likely to use these areas regularly for these purposes.

Known bat roosts are present within nearby buildings at Pale Hall, although no roosting features within the development site are proposed to be affected.

Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

We consider that the submitted information provides an adequate basis upon which to assess the potential impacts of the scheme on this species and inform the decision making process. We recommend that you discuss the need to secure further avoidance measures with your

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

internal ecological advisor.

Other matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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.

If you have any queries about the above, please do not hesitate to contact us.

Response following the second consultation:

Thank you for the further correspondence regarding this application that we received on 14 July 2026. We have reviewed the response from the applicant. However, no additional information has been provided. The applicant has not provided the groundwater risk assessment or equivalent hydrogeological evidence advised in our consultation response dated 2 July 2026. Whilst the submission states that a reduction in phosphate loading may arise through the installation of a package treatment plant, the information provided to date does not demonstrate that there is no pathway for nutrients to reach the River Dee and Bala Lake SAC.

We note the reference to a NRW response for a related scheme (planning reference not provided) where NRW stated “With regard to Phosphorus loading we advise that where a drainage field can work effectively for small discharges to ground (meeting our screening criteria) the phosphorus is retained within the drainage field plume...”. However, given the volumes as part of this planning application, we do not consider that the scheme meets our screening criteria (see the section titled “What development proposals are unlikely to increase nutrient levels within a river SAC” of our Advice.) and therefore we have advised the submission of the information identified in our response. We note that the Shadow HRA identifies impact pathways and relies upon mitigation measures, including drainage controls, lighting controls, buffer zones and pollution prevention measures, in reaching its conclusions. However, in line with the ‘People Over Wind’ ruling, mitigation measures should not be taken into account at the screening stage and would instead need to be considered at the Appropriate Assessment stage. We therefore maintain our advice that likely significant effects on the SAC cannot currently be ruled out and that an Appropriate

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Assessment is required. To conclude, we continue to advise that the information advised in our response dated 2 July 2026 be submitted to your Authority. We also recommend that the applicant contacts our Permitting Services for further advice on the Permit variation that may be needed.

Conservation Officer:

Not received.

Licensing Officer:

Response following re-consultation

Following the additional information, the Licensing Department has no further observations apart from the following.

This development will be subject to the Legislation stated below relating to Health and Safety, Fire Safety and Public Health provisions as follows: 1. 2. 3. Health and Safety at Work, etc Act 1974 The Caravan Sites and Control of Development Act 1960 Model Standards 1989 - Static Caravans The development must comply fully with licence conditions www.gwynedd.llyw.cymru/caravanlicence Following the additional information received, the Licensing Service has no further observations other than these below.

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

Fire Service:

With reference to your consultation dated 05/06/2026, received on 08/06/2026. Attached is our inspection report in respect of application C25/0273/04/LL. The Fire Authority does not have any observations in regard to access for appliances and water supplies. If you should require any further information, please do not hesitate to contact the Compliance Officer.

Biodiversity Unit:

I visited the site in April with the applicant's ecologists and discussed the proposal with the applicant.

The applicant has provided an ecological report:

Palé Hall, Bala Preliminary Ecological Appraisal produced by Turnstone Ecology dated May 2025

This report has been produced to a good standard.

Trees & TPO

The whole woodland and trees are covered by a Tree Preservation Order. It is likely that the trees within the TPO will be impacted, the Tree Officer must be consulted.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Woodland Habitat

The woodland has many planted and ornamental trees, during my site visit it has several ancient woodland indicators in the ground flora such as bluebell, wood anemone, violet, lesser celandine, and *Luzula pilosa*. Rhododendron and Laurel dominate the shrub layer, these plants are not native and considered invasive, I would recommend removal of these, however they do provide cover for flying bats and birds and reduce light spill.

The installation of shepherds' huts and the associated infrastructure (electric cabling, water pipes, sewage pipes and pathways) will have a small impact on the habitat and slightly fragment the habitat in the short term. Hard standings and pathways damage tree roots and mycorrhizal habitats and in the long-term trees with damaged roots are likely to be felled, especially for safety concerns and this would lead to further degradation of the woodland habitat.

There will be a greater amount of human activity in the woodland especially at night and this will disturb species such as otter.

Lighting & illumination

Illumination within the woodland will impact species primarily bats but also otters, amphibians and invertebrates. Low level lighting and motion triggered lighting should only be used.

Protected Species

Otter spraint found on stone by ornamental pond. Otters are along the River Dee.

Bats foraging and roosting in trees any trees to be felled would require bat surveys. Although the proposal states that no trees are planned to be removed, but once the huts are installed it is likely that there will be a need to remove trees.

River Dee

The River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid (Wales) is located 270m to the west of Pale Hall and is a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) which provides drinking water to a large proportion of North Wales. The River Dee is designated for its floating vegetation often dominated by Water Crowfoot (*Ranunculus fluitans* and *Callitriche Batrachion*), fish species including Bullhead (*Cottus gobio*), River Lamprey (*Lampetra fluviatilis*), Brook Lamprey (*Lampetra planeri*), Sea Lamprey (*Petromyzon marinus*) and Atlantic Salmon (*Salmo salar*).

The proposal is for the foul drainage to be discharged to two new package sewerage treatment plant. NRW guidance to planning authorities state that private sewage treatment systems discharging

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

domestic wastewater to ground which are located more than 50m from the SAC (any waterbody), and which have a daily discharge rate of less than 2 cubic metres (m³) can be screened out.

However, whilst the proposed private sewage treatment system is located more than 50m from the SAC (any waterbody), across the site as a whole, the discharge will be greater than 2m³.

The applicant has submitted a Foul Drainage Assessment produced by GeoSmart Information Ltd (26th Feb 2025). This document states:

“ By infiltrating foul water to ground there will be no pathway for nutrients to enter the River Dee (located c.150 m west) and the development will therefore have no adverse effect on the SAC. Percolation testing has been undertaken at the site and confirmed a percolation rate of 25 Vp.”

The following is the calculations within the document:

“• A Mobile home type caravans with full services = 150 litres per person per day.

• Each unit is assumed to have an occupancy of two persons.
• The existing site is undeveloped and therefore does not currently produce any wastewater.

• Proposed development is for two sets of five caravans

Existing - • 0 m3 per day

Proposed - • 150l x 2 persons per caravan x 5 = 1,500 l = 1.50 m3 per day per each area of the Site for a total of 3.00 m3 across the Site”

This document states that the sewage discharge from the proposal will be greater than 2m² as indicated Foul Drainage Assessment (above), therefore it cannot be screened out as an impact on the SAC.

The above calculations have omitted to include the running of the hotel and restaurant which must also be served by the same septic tank and soakaway, and the assessment is wrong when it states *“the existing site ... does not currently produce any waste water”* There is currently an application to extend the restaurant.

As this information does not allow us to ascertain whether this development will have an impact on the River Dee SAC it must be refused.

Trees Unit:

The tree report has been completed to a good standard and confirms, from an arboricultural perspective, the development will avoid most impacts to trees. There are some very valuable parkland trees here (protected by TPO) the tree report implies some specimen trees have recently been worked on. The landowner should be

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

aware of their duty to seek planning consent before undertaking tree work to protected trees (including clearance and/or safety work). Works subject to a planning exemption (dead, dying or immediately and obviously dangerous) should first be checked with coed@gwynedd.llyw.cymru

Response following re-consultation

No objection to the addendum

Land Drainage Unit:

Flood Risk and Land Drainage

INFORMATIVE: The site generally lies within zone 1 (Development advice maps accompanying TAN15: Development and Flood Risk) which is usually considered to be at little or no risk of flooding. However, there is a section of Site B which lies within an area shown to be at risk from surface water and small watercourses. The developer should be aware of the risk of flooding and should take all necessary precautions to protect the development from impacts of flooding in the future.

Heneb:

Thank you for consulting us on the below application. There appear to be no significant implications in relation to archaeology but, as you may be aware, the estate is currently under consideration to be added to the Register of Historic Parks and Gardens. This process will involve characterisation of the estate, a review of its history, and an understanding of the importance of its various elements, which is currently lacking. I am therefore copying in the relevant inspector at Cadw, who may wish to offer comment on the application and will be able to advise on the current status of the review and any implications for the present application. It is possible that we may also wish to provide comments on this aspect, should relevant information become available during the determination period.

CADW:

Thank you for your letter inviting our comments on the planning application consultation for the proposed development described above. This response is based on the advice provided by Cadw's Historic Environment Planning Officer.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment. The national policy and Cadw's role in the planning process is set out in Annex A.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Assessment

Cadw are currently considering the park and garden at Pale Hall for addition to the Register of Historic Parks & Gardens in Wales. It is considered that the site meets the criteria for registration for its well-preserved nineteenth-century landscape park, informal grounds with walks, woodland and lawns, and Victorian terraced gardens which provide the pleasant setting to Palé Hall. The estate is the seat of the Lloyds of Palé. It also has historical associations with the eminent railway engineer and Liberal MP Henry Robertson (1816-1888), and the Shrewsbury architect Samuel Poutney Smith (1812-1883). Queen Victoria stayed at Palé on a visit to north Wales in 1889. Cadw therefore consider the heritage significance of the grounds at Pale Hall to be of higher value than assessed in the supporting Heritage Impact Assessment by Hughes Architects. Pale was bought by Henry Robertson who had previously lived with his family at the nearby Crogen estate. The present house was designed by Samuel Poutney Smith and built in 1869-71 for Henry Robertson on the site of the earlier house. Henry Robertson also improved the grounds. He built the entrance lodge, also by Poutney Smith, and constructing a new winding drive through the park. The gardens were laid out by Robertson's newly appointed head gardener Thomas Ruddy. The principal rooms of the new house to the west and south take full advantage of views from the house to the gardens. Thomas Ruddy's diaries record his meeting with the Robertsons to discuss the gardens including making a flower garden, the terraces and the glasshouses.

The proposal seeks to install eight shepherd's huts within the grounds of Palé Hall to support the existing hotel business. The huts are described as being mounted on metal wheels, with metal sheet roofing, timber windows and timber cladding. The supporting Planning Statement (page 3) states that each hut measures 10m x 10m with a height of 2m; clarification is requested as this appears inconsistent with the typical form and proportions of shepherd's huts.

No parking is proposed at the huts themselves with visitors using the hotel's existing parking facilities; this approach is welcomed.

Access to the huts will be via woodchip footpaths. The route from the garden terraces to the development area is currently a grass path, and it is desirable to retain this character by keeping as much of the route as possible as a grass path.

The proposals include two package treatment plants, as shown in the Foul Drainage Assessment. The Heritage Impact Assessment provides limited information on the potential effects of the proposed foul drainage treatment infrastructure and drainage field on the historic garden, and further detail is required.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Supporting documentation states that emergency vehicle access would be via an existing entrance gate. Clarification is requested as to whether any works are proposed to alter the boundary wall or ground surface in this location to facilitate such access.

The huts are proposed to be sited on concrete pad foundations. It is recommended that a more reversible solution be explored to minimise the impact on the historic garden. While shepherd's huts are typically considered temporary structures, the inclusion of concrete bases and connection to a foul drainage system would reduce their reversibility and impart a more permanent character.

The Planning Statement emphasises an intention to 'touch the earth as lightly as possible', accordingly, alternative foundation solutions should be considered.

The supporting documentation states that the proposal will not affect existing trees, shrubs or root systems, which is welcomed. It also notes that the development will not be visible from the hall, with existing mature planting providing screening from the formal terraces, the hall, and the upper walk.

The pond within the development area is not shown on historic mapping. However, a stream feeding into a pond on the opposite side of the lane at Wern Dywyll is depicted. It is therefore likely that the pond within the development area was created during the latter half of the twentieth century.

Public Consultation

A notice was posted on the site and nearby residents were notified. The advertisement period has expired, and the following observations were received:

- Some months ago, a similar application was refused due to the listed building, i.e. Y Palau and as far as I can see, not much has changed. The Community Council also objected the previous application.

5. Assessment of the material planning considerations:

- 5.1 The application site is located in an area that is defined as open countryside and is within a Special Landscape Area in the LDP. Policy PCYFF1 of the LDP states that proposals located outside development boundaries will be refused unless they are in accordance with specific policies in the LDP or national planning policies or that the proposal demonstrates that its location in the countryside is essential.
- 5.2 The proposed holiday units would be connected to a sewage treatment plant that serves the hotel and the proposed shepherds' huts and would include a bathroom consisting of a shower, toilet and basin. It is noted that paragraph 6.3.86 of policy TWR5 states: *"Any proposals that include*

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

structures with mains water and drainage will be dealt with under policy TWR3."

- 5.3 In addition, it is noted that the units in question would sit on a concrete base approximately the same size as the hut 7m long x 2.75m wide and the units in question would be situated on the land throughout the year rather than ones that would be moved seasonally from the site. It is therefore considered that the proposal must be considered under Policy TWR 3 of the LDP and that in terms of planning policy that they are permanent.

- 5.4 As already noted, the site lies within a Special Landscape Area. Criterion 1 of policy TWR 3 notes:

"Proposals for the development of new static caravan sites (i.e. single or twin caravan), holiday chalet sites or permanent alternative camping accommodation will be refused within the Anglesey Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas."

Paragraph 6.3.69 of policy TWR 3 refers to the fact that a Landscape Capacity and Sensitivity Study was commissioned in Anglesey, Gwynedd and Eryri National Park to manage developments such as static caravan and chalet sites by identifying and protecting sensitive areas, and particularly from inappropriate developments. Paragraph 6.3.72 of the policy notes:

"Special Landscape Areas are non-statutory local designations. Their aim is to ensure that the landscape is not damaged by inappropriate developments. The sensitivity and capacity study concluded that within the Area of Outstanding Natural Beauty and Special Landscape Areas (and all areas that contribute to their setting), it is considered that there is typically no capacity for further static caravan/chalet park developments or extensions."

Considering the above, it is clear that the proposal is fundamentally contrary to point 1 of policies TWR 3 and PCYFF 1 as it would establish a new permanent alternative camping accommodation site within a Special Landscape Area.

Visual Amenities

- 5.5 As has already been noted, the site is within a Special Landscape Area. A Landscape and Visual Appraisal has been submitted as part of the application, which concludes that the 10 shepherds' huts would have a very limited impact on visual amenities, with the impact mainly limited to the direct vicinities of the site within the grounds of Palé Hall. The development is located within the existing woodland area and parkland, with mature trees and rhododendron bushes providing a substantial screen from outside views.
- 5.6 Eight representative points of view were assessed as part of the visual assessment. Of these, only those within the grounds of Palé Hall were noted as those that would experience a significant visual change. Point of View 1 (Palé gardens and hotel rooms) as one that would experience the least visual impact, with only a limited or seasonal snapshot possible of the huts. Point of View 2 (the footpath between the woodland and Palé Hall) as one that would prove a minor visual impact due to introducing new elements to the views experienced by estate visitors. Every other viewpoint has been assessed, including nearby dwellings, public rights of way, listed buildings

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

and adjacent roads, as those that would experience the least visual or negligible impacts as the development would not be visible from these locations.

- 5.7 The Evaluation recommends several mitigation measures to further reduce the visual impacts. These include the relocation of two of the huts from the northern part of the site and provide additional planting of species that are characteristic of the lower layer of the woodland surrounding the accommodation units.
- 5.8 Consequently, it is considered that the development is well integrated in its landscape context and it would not cause unacceptable harm to the wider area's visual amenities, it is therefore deemed that we are satisfying the requirements of policies PCYFF 3 and AMG 2 and the Joint LDP.

General and residential amenities

- 5.9 The site is within a countryside location in the gardens of Palé Hall Hotel. There is only one dwelling-house in the vicinity, namely Palé Sheiling to the south east of the site with the B4402 county highway as well as existing mature high trees between the site and Palé Sheiling. Due to the distance between the development, the public road and the high trees, the property would be unlikely to be significantly affected by the proposal. It has to be borne in mind that this is the site of an existing substantial hotel, therefore, it is not considered that the 8 shepherds' huts units would entail a significant change to this situation and what will be experienced in terms of activity and noise. The proposal, therefore, would not have a significant impact on nearby residents and it is considered acceptable based on the requirements of policy PCYFF 2 of the Joint LDP.

Transport and access matters

- 5.10 Policies TRA 2 and TRA 4 of the Joint LDP involve assessing proposals in terms of their impact on road safety. The site is served by a second-class county road, namely the B4402, and an existing rural track. The current hotel offers 22 rooms for visitors; it is considered that the addition of 8 shepherds' huts would not intensify the traffic flow to the site and would not be significantly different to what is currently experienced. No parking spaces are offered near the huts themselves, with visitors using the hotel's existing parking facilities. Access to the huts will be gained via the footpaths only. Observations were received from the Transportation Unit to the consultation noting that the unit had no objection. Considering the Hotel and the parking arrangements already on the site and since there is no intention to make any change to the current arrangements, it is deemed that the proposal is acceptable in terms of policies TRA 2 and TRA 4 of the Joint LDP.

Flooding and Drainage Matters

- 5.11 The site (site 'B') is partially located within a C2 and C3 Flood Zone for surface water and small watercourses as noted by the 'Flood Map for Planning'. Advice was received from the Drainage Unit stating that the developer should be aware of this risk and should take all necessary precautions to protect the development from the impacts of flooding in the future. However, it is noted that their observations refer to the flood zones in the former development advice maps, and that TAN 15: Development, flooding and coastal erosion (2025) is relevant to this application. Paragraph 6.1 of TAN 15 states that a Flood Consequence Assessment is required for any proposal for a development that is partly or fully within flood zones 2 and 3 - Surface Water and Small Watercourses. No Flood Consequence Assessment has been submitted as part of the application,

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

and therefore it does not comply with the requirements in this part of the TAN. It is noted that they were not requested to provide any further information as the site was located within a Special Landscape Area and the proposal is not acceptable in terms of the requirements of point 1 in policy TWR 3 of the JLDP and this cannot be overcome.

- 5.12 In addition, paragraph 10.19 of the TAN confirms the following for planning applications within zone 2:

"Applications for highly vulnerable developments on greenfield land are only appropriate where the site has been allocated in adopted Development Plans. Proposals for redevelopment on brownfield land of any vulnerability will need to assist, and be consistent with, the Development Plan strategy to regenerate an existing settlement or achieve key economic or environmental objectives. Where proposals for redevelopment include residential use, local authorities should ensure that such uses do not occur at ground-floor level"

Paragraph 10.20 of the TAN also confirms the following for planning applications within zone 3:

"In Zone 3, sites should not be set aside for new very vulnerable developments as it is not considered that there is a danger and the flooding consequences are acceptable for such a development."

The proposal is a new and very vulnerable development and is contrary to the requirements of policy TWR 3 of the Joint LDP and includes the residential use at ground floor level and therefore the proposal is contrary to the requirements of both these sections of the TAN.

- 5.13 In addition and in accordance with the requirements of paragraph 7.6 of Technical Advice Note 15: Development, Flooding and Coastal Erosion, a Drainage Strategy must be submitted as part of an application to outline the drainage scheme for surface water from the site, unless a separate application has been made to the approval body i.e. Cyngor Gwynedd's Land Drainage Unit. The proposal entails providing a hardstanding area underneath the units and no drainage statement has been presented as part of the application. Insufficient information has been submitted as part of the application to be able to confirm that the proposal complies with the requirements of part 7 of TAN 15: Development, flooding and coastal erosion." Again, it is noted that they were not requested to provide any further information as the site was located within a Special Landscape Area and the proposal is not acceptable in terms of the requirements of point 1 in policy TWR 3 of the Joint LDP and this cannot be overcome.

Biodiversity Matters

- 5.14 As previously noted, the entire site is included within a Tree Preservation Order - Palé Parkland, Llandderfel and partly within the Wern Dywyll Wildlife Site. A Trees Report was provided as part of the application which confirms that the development will avoid most of the impacts on trees. Observations were received from the Trees Unit stating that there are some very valuable parkland trees here (that have been protected by a Tree Preservation Order), and that the trees report suggests that work has been undertaken recently on some of the specimen trees. The applicant submitted an Appendix to the Trees Report which confirms after undertaking a site survey, that the proposal will not impact any protected tree. This is mainly because the shepherds' huts have been situated outside the Building Restriction Zones for protected trees, including specimen trees of a high amenity value with Preservation Categories A or B (BS5837:2012). In addition, the location of the shepherds' huts mean that there will be no need to construct foundations or undertake significant groundwork that may otherwise have a detrimental impact on nearby trees. Following a second consultation with the Trees Unit, it is stated that there is no objection to the Trees Report Appendix.

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

- 5.15 Also provided were a Preliminary Ecological Appraisal, May 2025, Sheltered Habitats Regulations Assessment, dated February 2026, as well as a Green Infrastructure Statement - March 2025 which proposes creating new habitats, improving water management and promoting ecological connectivity across the site. The use of native planting, features that are friendly to wildlife and sustainable drainage systems will ensure that the development contributes towards the environment's long-term health, reducing its ecological footprint to the extreme. A Landscaping Scheme was submitted showing the areas where it is proposed to plant bushes and a wildflower meadow as well as planting new trees on the site, it also provides details regarding planting, watering and strategic maintenance for the next five years.
- 5.16 Observations were received from the Biodiversity Unit and although the proposal does not currently include felling trees, it was stated that the development was likely to have moderate negative impacts on sensitive woodland habitat which has ancient woodland features. There is also concern regarding the risk of fragmenting the habitat and the potential impact on ecological connectivity, harm to the root systems of trees, increase in human disruption and the possible impact on protected species such as otter or bats. According to the unit, robust mitigation measures would be required, especially in terms of lighting, protecting trees and controlling invasive species, to reduce these impacts. Considering the possibility that there will be a need to control or fell trees in the future because of the development, there is a risk of more significant long-term impacts than those noted in the existing proposal.
- 5.17 Natural Resources Wales also note similar concerns regarding the presence of otters and bats on the site and they are of the view that the information submitted would provide sufficient grounds to assess the potential impacts of the plan on protected species, they suggest a number of conditions for any planning permission to ensure, appropriate mitigation measures. NRW are also of the view that the proposals have the potential to impact the Afon Dyfrdwy SSSI. If the impact pathways referred to for the SAC are considered sufficient as noted in the full observations above, NRW is of the opinion that the features of the SSSI are also sufficiently protected.
- 5.18 As has already been noted, the site is located within the Afon Dyfrdwy and Llyn Tegid Phosphorus Special Conservation Area (SAC), Afon Dyfrdwy is approximately 220m west of the site. 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.
- 5.19 The proposed development includes two new sewage treatment works. Although the systems are over 50m from the SAC, the volume of daily discharges is more than the threshold of 2m³ as noted in the Natural Resources Wales guidelines. Consequently, it is not possible to screen the proposal automatically, and the Council must further consider the drainage assessment and the possible impacts on the SAC. A Foul Water Drainage Assessment prepared by GeoSmart Information Ltd (26 February 2025) was submitted by the applicant as part of the application, but the Biodiversity Unit state that since insufficient information has been provided to be able to appropriately assess whether the development would have an impact on the Afon Dyfrdwy SAC, potential detrimental impacts cannot be ignored, and as a result the application should be refused.
- 5.20 Natural Resources Wales (NRW) note in their observations that the proposal includes replacing the current septic tank with a new sewage treatment plant, which would reduce the phosphorous load produced and according to NRW there is insufficient hydro geographical evidence provided to prove that nutrients or pollution reach the Afon Dyfrdwy and Llyn Tegid SAC. Furthermore, due to the proximity of the site to sensitive receptors and the ecological connectivity, the pathway

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

of pollution to controlled waters cannot be ignored. Therefore, they state that a further Ground Water Risk Assessment is required to indicate that the drainage fields act effectively and they will not impact the SAC. Following the receipt of additional information from the applicant, NRW made further observations on the application, and it was expressed that the applicant had not provided the additional information requested, namely the Ground Water Risk Assessment or matching hydrogeographic evidence. Although the proposal suggested that a pack sewage treatment plant would reduce the phosphorous load, there is insufficient evidence to show that nutrients cannot reach Afon Dyfrdwy and Llyn Tegid SAC.

- 5.21 NRW also note that the plan does not satisfy the screening criteria for small discharges into the ground, and therefore it cannot be relied upon the assumption that phosphorous will be kept totally within the drainage field. In addition, the Shadow HRA will depend on alleviation measures to come to their conclusions, however these measures cannot be considered during the screening stage. NRW therefore continue with the view that the likely significant impacts on the Afon Dyfrdwy and Llyn Tegid SAC cannot be ignored based on the information submitted.
- 5.22 Therefore, the Local Planning Authority is of the view, that the test of likely significant impact suggests that there may be a significant impact on the features of the Afon Dyfrdwy and Llyn Tegid SAC, due to the new sewage treatment works proposed and the proximity to the SAC. This means that an Appropriate Assessment is required but insufficient information has been submitted as part of the application for the Local Planning Authority to be able to complete an Appropriate Assessment in this case in accordance with the Authority's requirements under the Conservation of Habitats and Species Regulations 2017. It is therefore concluded that there can be no assurance that the proposal will not have a significant or adverse effect on the SAC due to the lack of information. They have not been asked to provide any further information because the site is located within the Special Landscape Area and the proposal is not acceptable in terms of the requirements of point 1 in policy TWR 3 of the Joint LDP and this cannot be overcome.
- 5.23 It is considered that the general impact of the proposal on the landscape can be controlled and any species that are not a feature of the SAC are acceptable via planning conditions and suitable biodiversity enhancements, but as it is not possible to ensure that the proposal has no adverse effect on the SAC and its features, the proposal does not comply with the requirements of policies PS19 and AMG 5 of the JLDP or chapter 6 of PPW that deal with green infrastructure, net benefit to biodiversity, the defence given to Sites of Special Scientific Interest and trees and woodlands.

Archaeological/Heritage matters

- 5.24 Heneb, the Trust for Welsh Archaeology, confirm in their comments that it does not appear that there are any significant implications in relation to archaeology on the site and it was highlighted that the estate was currently being considered for inclusion in the Register of Historic Parks and Gardens.
- 5.25 Observations were received from CADW, who note that they consider that Palé Hall is likely to be of higher heritage value than assessed by the applicant in the Heritage Impact Assessment and the park and gardens are in the process of being considered for registration as a Historic Park and Garden. CADW states that the information presented with the application is currently insufficient, and further details were requested regarding the size and design of the huts, the drainage system, emergency access and the impact on the historic gardens. Particular concern was expressed

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

regarding the use of concrete foundations, and it was recommended that other foundation methods, which would have less impact on the historic gardens, be investigated.

- 5.26 A response was provided to CADW observations by the applicant as additional information on the application; the applicant recognises that CADW are considering including Palé Hall grounds on the Register of Welsh Historic Parks and Gardens but argue that this should not prevent such a development due to its heritage significance. It is noted that CADW has not objected the principle of installing the shepherds' huts and have offered practical advice and minor mitigation measures only. According to the applicant, CADW also accept that the plan would not harm the historic value of the site and would not impact the trees, shrubs nor the existing roots systems. It is stated that five of the huts have been in parts of the gardens that are far from the main listed building and is more or less similar in terms of character to the adjacent agricultural fields. Due to their secluded and distant location, they will not be visible from the hall or to the public. Another three huts are screened by mature rhododendron, which provide cover throughout the year.
- 5.27 The applicant also notes that neither the sewage treatment works nor the associated drainage infrastructure will have any impact on the historic garden or on the listed building as they will be located underground. Neither the boundary wall nor the existing paths will need to be amended to provide emergency access, and the existing gate will remain. An error is corrected in the Supplementary Planning Statement regarding the size of the shepherds' huts; their proposed size is 7m long, 2.75m wide and 4m high. In terms of the foundations, it is stated that the applicant is open to use less detrimental methods, such as helical screw piles or vibro stone piles, subject to the results of the geographical information that is yet to be assessed.
- 5.28 Although the applicant's comments were considered in the response to the CADW observations, this information was provided at their own free will, they were not requested to provide any further information as the site is located within a Special Landscape Area and the proposal is unacceptable in terms of the requirements of point 1 in policy TWR 3 of the JLDP and this cannot be overcome, therefore, the applicant was not requested to present more information as outlined in the CADW observations about the impact of the development on the significance of the historic garden to avoid additional costs to the applicant.
- 5.29 CADW's observations are acknowledged; they ask for additional information (but do not detail that information) and confirm that they are considering the park and garden at Palé Hall as an addition to the Register of Historic Parks and Gardens in Wales, the site has not currently been designated, and CADW do not oppose this. Given that the development is well integrated into its landscape context and its relatively secluded location, it is not considered that it would have a detrimental impact on the listed building or its siting in this case and therefore it is considered that the proposal is not contrary to the requirements of policies PS 20 or AT1 in the JLDP.

Sustainability

- 5.30 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

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

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), 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;"

- 5.31 According to the applicant's Planning Statement, the development enhances and expands the tourism and hospitality offer at Palé Hall by providing new shepherds' huts and enhancing the site's accessibility. It is argued that this will support the local economy by attracting more visitors and events. The application also notes that the improvements make the site more inclusive and accessible to people with a wide range of mobility needs, enabling wider use of the location for events such as weddings and functions. In addition, it is claimed that the development will include sustainable measures such as energy efficient features and sustainable drainage systems, by ensuring a balance between protecting the site's heritage and supporting its long-term economic viability. It is therefore considered that the proposal is acceptable in relation to Policy PCYFF 5 and Policy PS 6 of the LDP.

Language Matters

- 5.32 It is noted that there are some specific types of development where it will be required for the proposal to submit a Welsh Language Statement or a Welsh Language Impact Assessment. The thresholds in terms of when it is expected to submit a Statement/Report have been highlighted in Policy PS1 of the JLDP, along with Diagram 5 of the SPG 'Maintaining and Creating Distinctive and Sustainable Communities' The development in question does not meet these thresholds.
- 5.33 Excluding the developments that meet the thresholds for submitting a Welsh Language Impact Statement/Assessment noted in Policy PS1, guidance is provided regarding the type of relevant applications where it is necessary to consider the Welsh language in Appendix 5 (The Screening Procedure) of the SPG (sections Ch to Dd). 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 demonstrate how consideration has been given to the language. There is no information in the application as to how the proposed development gives consideration to the Welsh language, and as the proposal is contrary to the policy within the LDP, as it is not considered to be a high-quality development and that it cannot be overcome, the applicant was not requested to submit information on how they considered the language as part of the application in order to avoid additional costs for the applicant. However, when considering the comparative minor nature of the development, it is agreed that it is unlikely that this development would lead to an additional significant impact on the community's linguistic character and it is considered that it is possible to set appropriate conditions to ensure a Welsh name for the development together with ensuring bilingual signage within the site. To this end, it is not considered that the proposal is contrary to the requirements of Policy PS1 of the Joint LDP.

6. Conclusions

- 6.1 The economic situation in the countryside and associated with existing tourism businesses are well known in terms of the seriousness of securing economic viability. The principle of a new development that would contribute towards improving the local economy is therefore fully

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

supported. However, this does not mean that any proposal submitted can be permitted and proposals must fully comply with the relevant requirements of policies that protect a highly sensitive area such as this one from unacceptable new developments.

- 6.2 Having weighed-up the above proposal, we conclude that the development is unacceptable, and based on the above assessment there is no option but to refuse the application for the following reasons.

7. Recommendation: To Refuse

1. The proposal would create new permanent alternative camping accommodation within a Special Landscape Area and is therefore contrary to point 1 of policy TWR 3 as well as PCYFF 1 of the Anglesey and Gwynedd Joint Local Development Plan (2011-2026) which protects the Special Landscape Area from this type of development.
2. The test of likely significant impact suggests that there may be a significant impact on the features of the Afon Dyfrdwy and Llyn Tegid SAC, due to the new sewage treatment works proposed and the proximity to the SAC. This means that an Appropriate Assessment is required but insufficient information has been submitted as part of the application for the Local Planning Authority to be able to complete an Appropriate Assessment in this case in accordance with the Authority's requirements under the Conservation of Habitats and Species Regulations 2017. It is therefore concluded that there can be no assurance that the proposal will not have a significant or adverse effect on the SAC due to the lack of information and therefore the proposal does not comply with the requirements of the Conservation of Habitats and Species Regulations 2017 or the requirements of policies PS19 and AMG 5 of the JLDP or chapter 6 of PPW that deals with green infrastructure, net benefit to biodiversity, the defence given to Sites of Special Scientific Interest and trees and woodlands.
3. The site is partially located within a C2 and C3 Flood Zone for surface water and small watercourses as noted by the 'Flood Map for Planning'. No Assessment of Flood Consequences has been submitted as part of the application and the application means providing a new very vulnerable development on ground floor level and therefore the proposal does not comply with the requirements of paragraphs 6.1, 10.19 or 10.20 of Technical Advice Note 15: Development, flooding and coastal erosion (2025) that ensures that very vulnerable developments are not located within flood zones where they would cause a risk to life.
4. No drainage statement has been submitted as part of the application, and therefore insufficient information has been submitted to be able to confirm that the proposal complies with the requirements of part 7 of TAN 15: Development, flooding and coastal erosion (2025) in terms of providing a sustainable drainage system.