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| PLANNING COMMITTEE | DATE: 03/03/2025 |
| REPORT OF THE ASSISTANT HEAD OF DEPARTMENT | |

Number: 2

Application Number: C24/0734/17/LL

Date Registered: 18/10/2024

Application Type: Full

Community: Llandwrog

Ward: Groeslon

Proposal: Change of use of chalet / bedrooms to proposed 10 affordable residential units (mix of 1 and 2 bedroom, self-contained units)

Location: Stables Hotel, Bethesda Bach, Caernarfon, Gwynedd, LL54 5SD

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 Full application for the change of use of chalet / bedrooms to proposed 10 affordable residential units (mix of 1 and 2 bedroom, self-contained units). The existing building comprises 17 en-suite bedrooms, reception, staff accommodation and plant room. The proposal would include the adaptation of bedrooms into the following mix of units:

1 x 1 bedroom, 1 occupant.

7 x 1 bedroom, 2 occupants.

1 x 2 bedrooms, 4 occupants.

1 x 2 bedrooms, 3 occupants.

- 1.2 To the north lies the former Stables Country House and a detached house named Tŷ Plas Ffynnon. It is intended to adapt the building by creating an opening for a patio door and closing a few existing door openings; no new extension is proposed. The building is erected in the form of an L shape, with a yard in the centre for the residents' use. The building is constructed of red brickwork and there are slates on the roof.

- 1.3 The site is served by an existing vehicular access off the A499 county road. The site is located outside any village boundary as defined in the Anglesey and Gwynedd Joint Local Development Plan. Note that a bus station is located in the nearest villages to the north and south of the site, and a footpath runs past the access to the site. A public footpath runs along the southern and eastern boundary of the application site. It is proposed to retain the existing car park for 20 vehicles associated with the proposal, the remaining places will be used by the existing hotel and restaurant.

- 1.4 As a part of the application, the following was received:

- Green infrastructure statement
- Planning and Access Statement
- Water Conservation Statement
- A pre-application public consultation report
- Planning Statement

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.

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2.3 Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017

ISA 1: Infrastructure provision
 PCYFF 1: Development Boundaries
 PCYFF 2: Development criteria
 PCYFF 3: Design and place shaping
 PCYFF 4: Design and landscaping
 PCYFF 5: Carbon management
 PCYFF 6: Water conservation
 PS 5: Sustainable development
 PS 6: Alleviating and Adapting to the Effects of Climate Change
 AMG 5: Local Biodiversity Conservation
 PS 1: The Welsh Language and Culture
 TWR 2: Holiday Accommodation
 PS 18: An appropriate mix of housing
 TAI 7: Conversion of traditional buildings in open countryside into residential use
 TAI 8: An appropriate mix of housing
 PS 18: Affordable Housing
 PS 4: Sustainable transport, development and accessibility
 TRA 2: Parking standards
 TRA 4: Managing transport impacts
 PS 19: Conserving and where appropriate enhancing the natural environment
 PS 20: Preserving and where appropriate enhancing heritage assets

Supplementary Planning Guidance (SPG): 'Replacement Dwellings and Conversions in the Countryside'

2.4 National Policies:

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 11 - February 2021)

Technical Advice Note 12: Design

Technical Advice Note 18: Transportation

Technical Advice Note 23: Economic development

3. Relevant Planning History:

Application number C00A/0024/17/LL – EXTENSION to the Stables Hotel And Restaurant, Bethesda Bach – Approved on 24.02.2000

Application number: C09A/0514/17/LL - FULL APPLICATION TO CONVERT AND EXTEND A FORMER OUTBUILDING INTO HOLIDAY ACCOMMODATION –Stables Hotel And Restaurant, Bethesda Bach. Approved on 06.01.2010

Application number: 3/17/32 – Extension of restaurant, new staff accommodation and new preparation room at The Stables Restaurant – Approved on 16.01.1975.

Application number: 3/17/32 A – New ladies W.C. and extension to reception area.

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Application number: 3/17/32 B- Hotel development with 12 bedrooms, staff accommodation and parking area at Plas Ffynnon – Approved outline planning permission on 02.02.1978.

Application number: 3/17/32 C – Open link corridor between hotel and restaurant at the Stables – Approved on 21.12.1978

Application number: 3/17/32 D – Proposed swimming pool and paved area to lawn of hotel at The Stables Restaurant, Llanwnda – Approved on 07.06.1979

Application number: 3/17/31 E – Proposed new breakfast room and two staff bedrooms to rear of hotel at Plas Ffynnon – Approved on 02.08.1982.

4. Consultations:

Community/Town Council:

I write on behalf of Llanwnda Community Council. Although the property in question is located in the Groeslon Ward, it directly abuts the Llanwnda Ward. Having considered the matter in detail, and listening to local views, the members did not feel that it was possible to support the proposal in its current form.

It must also be asked, if the development would be for the homeless, what would be the management plan for the site.

Whether the accommodation is for the homeless or not, it is clear that what we have in question here is a change of use of the existing accommodation building of Stables, into 10 affordable residential flats.

Therefore, the question is whether this use is acceptable and complies with the current planning policies.

One of these is that new developments in rural areas are located in settlements with relatively good access without the use of a car.

The members are of the opinion that the development is not located in a location that has good access without the use of a car.

There are no shops, schools or community facilities within a reasonable walking or cycling distance from the site.

Although a bus service that runs between Pwllheli and Caernarfon passes the site along the A499, there is still a need to walk to Bethesda Bach or Llanwnda to catch the bus.

The walking distances are not very far, but they are not close either. Most people would be of the opinion that the walking distance to either bus stop would be too far for those who have been grocery shopping or who carry bags as they walk.

Developments of residential flats are usually located in towns or sites

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with an urban feel where it is possible to obtain easy access on foot to services.

Therefore, the Council does not feel that the proposed development corresponds with planning policy PS4.

The flats are very small in size; therefore they are unacceptable for long-term occupancy, and therefore the development is unsuitable in its current form.

Likewise, 10 flats in a rural site is excessive, and the mix is unsuitable - i.e. a flat for one person or a flat for 2 persons but only one bedroom, or a flat for 4 persons with only two bedrooms.

Should the number of flats proposed be substantially less, but more in terms of their size, and with a suitable number of bedrooms, it may be possible to come to a different opinion about the development.

There is no evidence that there is a demand in the local area for this type of provision.

Whether for the homeless or as affordable flats, it is unlikely that there is a local demand, and therefore the residents may come from a wider area, which would have a negative impact on this native Welsh community.

Is there sufficient evidence to respond to policy TAI 7, namely that there is no possible use of the existing buildings for employment?

The Stables hotel, to which the accommodation is linked, has been for sale for 18 months, but this is not a very long period for hotels of this type, particularly following the Covid period.

Also, it must be questioned whether the Stables accommodation building is developed, what impact would that have on prospective buyers in using the Stables restaurant building in the future, as a restaurant business or for a private resident.

Conclusion

Members of Llanwnda Community Council do not support the application in its current form.

Should the number of flats be substantially reduced, if they are larger, and also have sufficient bedrooms, and a test for the need for such accommodation locally, then it may be possible to consider the development in a more favourable light.

Also, better evidence of the demand for the proposed mix of units is required, as well as clarity of the relationship between the developer and Cyngor Gwynedd and any proposal for the development to be a

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part of the Rent Wales plan.

The members would be grateful if you would consider their comments.

Transportation Unit:

The access point serving the development is well established, and there is no history of traffic incidents relating to the access. Having considered the previous use of the site as a hotel, I believe that it is unlikely that the development would create more traffic movements than those historically associated with the site.

For these reasons I will not object to the development.

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Natural Resources Wales:

We do not oppose the proposed development as submitted and we provide the following advice.

Protected Sites - foul drains

We note that the application site is within the catchment of the Afon Gwyrfaï and Llyn Cwellyn Special Area of Conservation (SAC). In accordance with our advice to planning authorities for planning applications which affect rivers in Special Areas of Conservation that are sensitive to phosphorous, under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within the catchment areas of SAC rivers.

However, acknowledging the specific nature of the application submitted, i.e., connecting waste water to the main sewer, which satisfies the screening criteria noted in our advice, we are satisfied that there is no source of additional nutrients and/or route for impacts. Therefore, in our opinion, it would be reasonable for your Authority to screen this proposal as something that is unlikely to have a substantial impact on the Afon Gwyrfaï and Llyn Cwellyn SAC in relation to nutrient input.

Protected Species

We note that there is no information regarding protected species with the application and therefore we assume that your Authority has screened the application and concluded that there is no reasonable likelihood that protected species will be present.

Welsh Water:

We note the application appears to rely on existing sewer connections. The proposed development site is located in the catchment of a public sewerage system which drains to Llanfaglan Wastewater Treatment Works (WwTW) and ultimately discharges to a river Special Area of Conservation (SAC). We would advise that this WwTW has a phosphorus consent limit by 31/05/2024 and is currently compliant with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation. Accordingly, we would advise there is currently suitable hydraulic capacity in the public sewerage system and downstream WwTW to accommodate foul water flows from the development subject of this application.

Notwithstanding the above, we would request if minded to grant planning consent that the following Condition and Advisory Notes are included to ensure no detriment to existing residents or the environment and to Dŵr Cymru Welsh Water's assets:

Condition: No surface water from any increase in the roof area of the building/or impermeable surfaces within its curtilage shall be allowed

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to drain directly or indirectly to the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.

Biodiversity Unit:

The plans show that there will be no change to the external structure of the building except for the addition of some doors. The proposed works will not alter the roof or any attic space. Therefore I have no concerns regarding bats. And there are no records of bats at this location. The proposed conversion to residential use is within the sewage catchment for the Llanfaglan WWTW which discharges to the Gwyrfaï SAC. The applicant has confirmed that the development will be connecting to the main sewer. Dŵr Cymru state in their comments, confirming their capacity to accommodate and treat sewage from the proposal: “We would advise that this WwTW has a phosphorus consent limit by 31/05/2024 and is currently compliant with the 95% quartile for its flow passed forward (FPF) performance, at the time of this consultation. Accordingly, we would advise there is currently suitable hydraulic capacity in the public sewerage system and downstream WwTW to accommodate foul water flows from the development subject of this application.” NRW state in their “opinion, it would be reasonable for your Authority to screen out this proposal as not likely to have a significant effect on the Afon Gwyrfaï a Llyn Cwellyn SAC in relation to nutrient inputs.” I agree with NRW opinion and I consider that this proposal is unlikely to have a significant effect on the Gwyrfaï SAC, therefore Cyngor Gwynedd as the competent authority has completed the duty required under the Habitats Regulations. I have no objection to this proposal.

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Public Consultation:

A notice was posted on site and nearby residents were notified and correspondence was received objecting on the grounds of:

- No consideration to the residents of the site due to the lack of resources within walking distance of the site.
- No reference to the system of securing the site.
- Concern regarding 7 x 1-bedroom units as they will likely give rise to security problems.
- The proposal is close to a nursery.
- No evidence from the applicant that there is a greater need for units or family units.
- No objection to local family units or families who have suffered domestic violence.
- No evidence to show the need for the units.
- Access to a busy road.
- No pavement or street lighting along the road.
- Ysgol Llanwnda has closed, no local school.
- No local services such as a shop, surgery, post office, etc.
- No evidence of local need.
- Number of units.
- Increase in Traffic
- The site is outside the development boundary.
- Within a rural area where there is a presumption against development.
- No work centre for the residents.
- Not on the bus route.
- The building is not of a traditional construction.
- Concern about the occupiers of the units.
- Overdevelopment.
- The site is not suitable for a development of this density and is likely to have an impact on local residents. There is insufficient evidence to show that the hotel is not viable.
- Proposed use is unsuitable with the current use of the site.
- There are no suitable resources in the village.
- Concerns raised about the procedure for the pre-application consultation.
- No consultation with local people.

In addition to the abovementioned objections, objections were received that were not valid planning objections, including:

- Developer is inconsiderate of the community.
- Reduction in the value of traditional property on the applicant's site.
- Reduction in the value of local property.
- Do not feel safe in the home.

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5. Assessment of the material planning considerations:

The principle of the development

- 5.1 The proposal to adapt the building into 10 living units is relevant to policy PCYFF 1 of the Plan which identifies Development Boundaries for the regional Centre, Urban Service Centre, Local Service Centres, Service Villages and Coastal Rural Local Villages. Proposals will be approved within development boundaries in accordance with the other policies and proposals in the Plan, national planning policies and other material planning considerations.
- 5.2 Outside the development boundaries, proposals will be refused unless they are in accordance with specific policies in this Plan or national planning policies or that the proposal shows that its location in the countryside is essential.
- 5.3 It is noted that Bethesda Bach has been identified as a Cluster in the Gwynedd and Anglesey Joint Local Development Plan. However, this building is located approximately 300 metres away from the buildings shown in colour and forms a part of the Bethesda Bach cluster and therefore the building stands in open countryside.
- 5.4 Policy PCYFF 1 ('Development Boundaries') states that proposals outside development boundaries will be refused unless they are in accordance with specific policies in the Plan or national planning policies or that the proposal shows that its location in the countryside is essential.
- 5.5 Although it is not considered that the location of the proposal in the countryside is essential, it is realised that the application relates to the adaptation of a modern building into living units and as a result Policy TAI 7 can be an important material consideration. The policy allows the conversion of traditional buildings in the countryside into residential use if the plan complies with the criteria of the policy.
- 5.6 Section 7 of the SPG 'Replacement Dwellings and Conversions in the Countryside' defines traditional buildings as those built prior to 1919 and of 'breathable construction', namely the building method means that the material used for construction can absorb and discharge damp. Note from the site's planning history that permission was granted to erect the building under application number 3/17/32B in 1978 to develop a hotel with 12 bedrooms. It was noted that a new building was raised following the permission in 1978 and therefore it will not be possible to consider the proposal against Policy TAI 7 of the Plan as it would not be a conversion of a traditional building.
- 5.7 The guidance also notes that a traditional building has an aesthetic value which derives from the way that people have sensible and intellectual enjoyment of the building and the character of the building often encompass the local unique features and contribute to the sense of place. The construction is mainly made up of a red brick construction and modern windows that do not have a high amenity value, and do not reflect the character and nature of traditional buildings in the area.
- 5.8 Taking this into account, the application does not meet the requirements of policy TAI 7 as the proposal does not involve the conversion of a traditional building. No other policy within the LDP allows a provision of affordable housing in open countryside and therefore the proposal is contrary to policy PCYFF 1. I note that the planning statement acknowledges that the site is 'previously developed land', but it is not justification that can overcome the policy noted.

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- 5.9 The proposal also does not meet criterion 3 as no evidence was received to prove that the building is structurally sound. It is noted in the SPG 'Any application for the conversion of a building for residential use should include a 'Structural Report' to prove that it is possible to convert the building without major or complete reconstruction.' Nevertheless, no request was made for further information as the application cannot meet the principle of policy TAI 7.
- 5.10 Similarly, and contrary to criterion 2, no information was received as a part of the application to prove the need for the affordable units and how the development has been designed to ensure an appropriate mix of housing in accordance with policy TAI 8.
- 5.11 Policy TAI 8, among other considerations, asks for a high-quality standard of design, which creates sustainable and inclusive communities, in accordance with policy PCYFF 3. In addition, paragraph 4.2.30 of edition 12 of Planning Policy Wales (PPW) states that: "All affordable housing, including those provided through planning obligations and planning conditions, must meet the Welsh Government's development quality standards...". In this respect, the proposal should comply with the requirements specified in the Welsh Government's document Welsh Development Quality Standards 2021: Beautiful Homes and Spaces (July 2021).
- 5.12 Appendix B of this document refers to the floor surface area (internal) of developments. For a one-bedroom flat (general access), a surface area of 50m² is expected (provided that the design does not endanger the quality of the homes intended to provide by this standard, a reduction can be used of up to 5% of the interior Surface Area (floor), i.e. a minimum of 47.5m² for this type of unit. For a two-bedroom flat (general access), a surface area of 58m² is expected, i.e. a minimum of 55.1m².
- 5.13 These plans note the size of the proposed units, including 7 x one-bedroom units and 1 of the two-bedroom units is less than the minimum size of 47.5m² and 55.1m² referred to above. Therefore, it should be noted that the units shown on the plans do not meet the Welsh Development Quality Requirements 2021: Beautiful Homes and Spaces (July 2021) from Welsh Government.
- 5.14 As the units do not meet the needs of the Welsh Development Quality Requirements, it is considered that the proposal is contrary to PPW. It is also considered, due to the restricted size of the units, that the proposal is contrary to policy TAI 8 as the proposal does not reflect a high-quality standard of design which creates sustainable and inclusive communities and that the units will not help create a healthy and vibrant environment, and they do not consider the health and well-being of future users in accordance with Policy PCYFF 3.
- 5.15 Criterion 1 of policy TAI 7 requires that there is evidence that employment use of the building is not viable. Also, considering the lawful use of the building as bedrooms for a hotel, policy PS14 (the Visitor Economy) applies, and it supports the protection of holiday facilities and accommodation. It is therefore believed there is a need to assess considerations in terms of losing this use.
- 5.16 The only information received from the applicant was that the building had been marketed over a period of 18 months since 2022 before the applicant made an offer to buy the building. It is not considered that such efforts are sufficient to meet policy requirements. The SPG 'Tourist Facilities and Accommodation' (March 2021) notes that if the hotel is empty and does not now operate as a business, the applicant should prove that a genuine effort has been made to market the unit for a period of at least 12 months for hotel use. The evidence should include copies of the hotel's marketing/sales advertisement as well as written confirmation from the estate agent in

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relations to the interest shown/offers made. It should also be ensured that the marketing strategy to sell the business has targeted the most suitable market, i.e. the use of specialist agencies which also have experience of marketing and selling hotels. When considering proposals that would lead to changing the use of hotels, the SPG also notes that it would be necessary to obtain financial evidence that the existing business is not viable. It is noted that a Financial Report should be submitted, which proves that the business is no longer financially viable and it is not expected that it could be economically viable in the future.

- 5.17 It is acknowledged that the planning statement offers more evidence from the company responsible for marketing the building but this was not requested as the application was unable to meet the principle of policy TAI 7 and that receiving the information would not overcome the conflict with the policy. Therefore, it is considered that the proposal is contrary to policy PS 14 and criterion 1 of policy TAI 7.

Visual amenities

- 5.18 Policy PCYFF 3 states that proposals will be approved, including extensions and changes to existing buildings and structures, if they comply with a number of criteria including that the proposal adds to or improves the character or appearance of the site, the building or the area in terms of setting, appearance, scale, mass, the height and elevation treatment; that it respects the context of the site and its place in the local landscape; that it uses materials that are appropriate to their surroundings and incorporates soft landscaping; that it improves a safe and integrated transport and communications network; that it limits the risk and danger of flood water run-off and prevents pollution; that it achieves an inclusive design that allows access for all and helps to create healthy and vibrant environments taking into account the health and well-being of future users.
- 5.19 The application site is located behind the hotel building and in an area where trees and hedges prevent a clear view of the building from the county road. It is also noted that it is intended to include the adaptation work within the existing shell of the building as it is, with exterior changes restricted to closing door openings and opening a patio door opening. There would be no increase in the size of the building.
- 5.20 It is realised that the building is not of a traditional construction or design as defined in Section 7 of Supplementary Planning Guidance (SPG): Replacement Dwellings and Conversions in the Countryside, and consequently, it is not considered that it is of a sufficient architectural or historical value to be retained. Nevertheless, the proposed changes would not alter much of the building's design and in this respect, it is not considered that changes to the design of the building would create a neutral impact on the building and landscape. It is not considered that the proposal is contrary to Policy PCYFF 3 within the LDP.

General and residential amenities

- 5.21 The application was advertised on the site and nearby residents were informed and correspondence was received objecting to the application for the reasons noted under the Consultations paragraph above. The building is located approximately 150 metres away from the houses of neighbours, except for the Plas Ffynnon house located beyond the hotel and consequently it is not considered that the proposal will have a substantial negative impact on the amenities or privacy of local residents. It is realised that concerns have arisen regarding 'who' would occupy the units but it is not possible to control the occupants of the units, except that they meet the terms of the affordable units. It is noted that many objections have been submitted and those objections are discussed under the relevant headings. Although the concerns raised are

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acknowledged, it is not considered that the proposal is contrary to policy PCYFF 2 in terms of the amenity impact.

Transport and access matters

- 5.22 The site is served by an existing access off the A499 county road, with a single private track approximately 150m long, leading from the access to the substantial car park in the rear of the site. The access is open to a busy county road, where traffic speed is restricted to 40 m.p.h. It should be noted that access arrangements would be shared by the existing hotel and restaurant and no changes are proposed to the existing access or parking space.
- 5.23 It is realised that the entrance has served a hotel as well as the sleeping rooms in the past. The Council's Transportation Unit states that there is no history of traffic incidents relating to the entrance and considering the site's previous use as a hotel, it is felt that it is unlikely that the development will create more traffic movements than were associated with the site historically. There is no objection to the proposal on the grounds of roads. It is not considered that the proposal is substantially contrary to policy TRA 2 or TRA 4 in the LDP.

Biodiversity Matters

- 5.24 The proposal involves adapting the building into living units and the adaptation work is restricted to the original shell of the building, with no changes made to the roof. Observations were received from the Council's Biodiversity Unit stating that they had no objection.
- 5.25 Observations were received from Natural Resources Wales (NRW), stating that the application site is within the Afon Gwyrfa and Llyn Cwellyn Special Area of Conservation (SAC). However, acknowledging the specific nature of the application submitted, i.e. connecting waste water to the main sewer, NRW are satisfied that there is no source of additional nutrients and/or route for impacts. Therefore, in the opinion of NRW, it would be reasonable for the Authority to screen this proposal as something that is unlikely to have a substantial impact on the Afon Gwyrfa and Llyn Cwellyn SAC in relation to nutrient input. In addition, Welsh Water state that there is a licence for the receipt of foul water into Llanfaglan water works.
- 5.26 As a result of the above, observations were received from the Biodiversity Unit, stating that it would be unlikely for the proposal to have a substantial negative impact on the Gwyrfa SAC and there is no objection to the proposal. Therefore, it is considered that the application is in accordance with policy PS 19 and AMG 5.

Language Matters

- 5.27 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 to that application. This is further reiterated in para. 3.28 of Planning Policy Wales (Edition 11, 2021), and Technical Advice Note 20. The Supplementary Planning Guidance (SPG) 'Maintaining and Creating Unique 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.
- 5.28 It is noted that there are some specific types of developments where the proposal will be required to submit a Welsh Language Statement or Report on the Welsh Language Impact Assessment. The threshold in terms of when it is expected to submit a Statement/Report highlighted in Policy PS1 of the JLDP, as well as Diagram 5 of PPW. In terms of the types of developments in

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question, the proposal does not reach the thresholds for submitting a Welsh Language Statement or a Report on a Welsh Language Impact Assessment. Nevertheless, Appendix 5 of the SPG states that every housing, retail, commercial or industrial development where a Welsh Language Statement/Assessment is not required, should show how consideration has been given to the language.

- 5.29 The proposal submitted is for the provision of affordable housing and the use of the existing site as bedrooms is ancillary to the hotel. It is not considered that the development would be likely to have a detrimental impact on the Language and therefore, it is considered that it complies with the requirements of policy PS1 in this context.

6. Conclusions:

- 6.1 Having considered planning matters that are relevant to this proposal, the Department is not in a position to support the application; proposal is located in open countryside, no affordable local need presented and confirmed and the building is not considered to be a traditional building within policy TAI 7 in the LDP.

7. Recommendation:

1. It is considered that the proposal is contrary to Policy TAI 7 and Supplementary Planning Guidance 'Replacement Dwellings and Conversions in the Countryside' as the building is not traditional. As there are no other policies within the LDP which approve new residential dwellings in open countryside, it is considered that the proposal is also contrary to policy PCYFF 1.
2. No evidence of the affordable local need was received, and neither was information showing that there was an appropriate mix of houses for the type of units proposed. As a result, it is considered that the proposal is contrary to policy TAI 7 and TAI 8.
3. No sufficient evidence was received to show that the commercial use of the building is not viable or evidence to justify the loss of serviced holiday accommodation, which is contrary to PS 14, and criterion 1 of policy TAI 7.
4. The units, due to their restricted size, are contrary to paragraph 4.2.30 of edition 12 of Planning Policy Wales as the units do not meet the Welsh Government development quality standards. It is also contrary to policy TAI 8 as the proposal does not reflect a high-quality design standard, which creates sustainable and inclusive communities and the units will not help create healthy and vibrant environments, and they do not consider the health and well-being of future users, as well as policy PCYFF 3.