

PLANNING COMMITTEE	DATE: 28/04/2025
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 1

Application Number: C18/0767/16/LL

Date Registered: 02/02/2023

Application Type: Full

Community: Llandygai

Ward: Tregarth and Mynydd Llandygai

Proposal: Holiday accommodation development (revised plan) which entails: -

- Laying the foundations for lodges with associated decking.
- Laying the foundations for glamping pods.
- Associated infrastructure to include internal tracks, parking areas, sustainable drainage systems together with foul water drainage.
- Soft and hard landscaping including felling of some trees, retaining trees and undertake improvements to the existing woodland.
- Construct a reception/sales building together with re-covering the existing building and use as an e-cycle hub with electric charging points.

Location: Land At Coed Wern, Glasinfryn, Bangor, LL57 4BE

Summary of the Recommendation: TO APPROVE WITH CONDITIONS.

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1. Description:

- 1.1. This is a full application to provide holiday accommodation and associated work on a plot of land known as Coed y Wern, Tŷ Gwyn to the southeast of the village of Glasinfryn and opposite the Class I county road (A.4244). The development has been revised and reduced in size several times since the application was originally submitted in 2018, and by now the proposal can be split into different elements which include the following: -
 - Provide foundations for 25 holiday lodges together with foundations for four glamping pods.
 - Associated infrastructure to include internal tracks to serve the holiday accommodation, parking spaces and turning areas, sustainable drainage systems together with apparatus to handle foul water (pumping station).
 - Soft and hard landscaping including the felling of some trees, retaining the majority of trees and the existing pond in the centre of the site together with undertaking improvements to the existing woodland.
 - Construct a reception/sales building together with re-covering the existing building and use as an e-cycle hub with electric charging points.
- 1.2. The site is served by a network of local roads that include the A55 and a third-class county road that also serves the nearby Glasinfryn settlement. The main entrance in and out of the site will be from this third-class county road. North of the site is agricultural land comprising the World Heritage Site of Penrhyn Quarry Railway, an estate of established housing at Bro Infryn and Lôn Las Ogwen; to the east is the A4244 with residential dwellings and woodlands; south is the Class III County highway and agricultural land, and west is agricultural land and afon Cegin.
- 1.3. The site itself is a woodland, and the section forming the boundary with the Class III highway towards Glasinfryn is subject to a Tree Preservation Order with the rest of the site being a Wildlife Site. The whole site is within the Dyffryn Ogwen Landscape of Outstanding Historic Interest, and the scheduled monument of the Penrhyn Quarry Railway is located on the eastern boundary of the site.
- 1.4. The following documents have been submitted as part of the application:
 - Ecological Review – Coed Wern Rev 3 03.03.2025
 - Coed Wern Green Infrastructure Statement 03.03.2025
 - Response to the observations of the Biodiversity Unit – Coed Wern 11.05.2023
 - LiDAR and Geometric Surveys 2021_036 16.04.2022
 - Topography Plans 2021
 - Economic Assessment November 2022
 - Flood Consequence Assessment, Phil Jones Consultancy October 2022
 - Strategy for Surface Water and Foul Water Drainage, A.L.I Building Design Ltd
 - Heritage Impact Assessment November 2022
 - Planning Statement together with a Design and Access Statement December 2022
 - Transportation Assessment December 2022
 - Trees and Development Report 24.11.2022 Rob Marsh Woodland Services Ltd
 - Visual Appraisal and Landscape Strategy, Land Studio December 2022
 - Ecological Assessment and Survey, Cambrian Ecology 16.11.2022
 - Community and Linguistic Statement 03.12.2018
 - Pre-application Consultation Report 878/09/15 27.07.2018
 - Trees Report, L. O'Connor September 2017

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- Extended Phase 1 Habitats and Protected Species Survey, Cambrian Ecology 2018

1.5. It is noted that the proposal has recently been reduced by removing 'zone 5' to avoid a more ecologically sensitive area which meant reducing the number of glamping pods from 11 to 4 as noted above.

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 2011-2026 adopted 31 July 2017: -

PS 1: The Welsh Language and Culture

PS 2: Infrastructure and developer contributions

PS 4: Sustainable transport, development and accessibility

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

PCYFF 5: Carbon Management

PCYFF 6: Water Conservation

PS 14: The Visitor Economy

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

PS 19: Conserving and where appropriate enhancing the natural environment

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

AMG 5: Local Biodiversity Conservation

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PS 20: Protecting and where appropriate enhancing heritage assets

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

Supplementary Planning Guidance – Maintaining and Creating Distinctive and Sustainable Communities

Supplementary Planning Guidance – Tourist Facilities and Accommodation

2.4 National Policies:

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 12 – February 2024)

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

Technical Advice Note (TAN) 12: Design

Technical Advice Note (TAN) 13: Tourism

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion

Technical Advice Note (TAN) 18: Transport

Technical Advice Note (TAN) 20: Planning and the Welsh Language

3. Relevant Planning History:

C00A/0432/16/R3 – ROUNDABOUT AND ROAD IMPROVEMENT TO THE JUNCTION OF THE TWO ROADS CLASS 2 (B4366 AND B4409) AND CLASS 3 ROAD TO GLASINFRYN - APPROVED 15.09.2000

C01A/0165/16/R3 - IMPROVEMENTS TO FELIN HEN JUNCTION (AMENDED SCHEME TO THAT APPROVED UNDER CODE REF C00A/0432/16/R3 - APPROVED 10.05.2001

C01A/0225/16/AM – DEVELOPMENT OF A FOREST PRODUCTS CENTRE TO ENABLE THE PROCESSING AND SALE OF LOCALLY PRODUCED TIMBER PRODUCTS - REFUSED 13.07.2001. REFUSED ON APPEAL

C02A/0775/16/LL – CREATE A NEW ACCESS FOR VEHICLES - APPROVED 14.02.2003

C03A/0467/16/YA – PROVISION OF TRACK WITHIN THE SITE – APPROVED 18.08.2003

C04A/0730/16/LL – CREATION OF POND FOR WILDLIFE HABITAT AND CONSERVATION, BY DIVERTING THE FLOW OF A STREAM INTO THE POND AND THEN RETURNING IT TO ITS ORIGINAL COURSE - APPROVED 25.11.2004

C04A/0867/16/YA – EXTENSION TO FOREST TRACK AND ERECTION OF SHED – APPROVED 01.02.2005

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3/TPO/A71 – Hedgerow near Coed Wern Tŷ Gwyn Glasinfryn 26/11/2001

4. Consultations:

Community/Town Council:

Comments 01.10.2018 Pentir Community Council

At a recent meeting of Pentir Community Council concern was expressed about the size of this development and its impact on the privacy of Bro Infryn residents. Detailed consideration should be given to the influence that a development of this size may have on a small estate of nearby housing especially the 4th development that will be very close to the houses. Additional traffic was also a concern to councillors and residents despite the comment that there would be no permission to turn right when exiting the development.

Comments 02.03.2023 Llandygai Community Council

Dear Officer,

We had a discussion in the previous meeting of Llandygai Community Council regarding this revised application. Please see the following list of observations:

An image from the home page of the Luxury Lodge Group's website, i.e. the group submitting this application was shown. The home page lists Coed Wern as one of the three sites under the management of the Luxury Lodge company, and notes that Coed y Wern is "launching in 2022". It is therefore clear that they take it for granted that they will receive planning permission.

Reference was made to one of the documents circulated with the amended application, namely "Land at Coed Wern: Planning Statement, including Design and Access Statement", dated December 2022. Please note here (section 7.17) that the development will only create two jobs, namely the manager's post and the post of groundsman.

Reference was also made to section 5.10 that deals with local bus services. There is no bus stop at Felin Hen, near the site, and it will not be possible to have a bus stop here as the road is very busy. It was also noted that only three buses a day serve Glasinfryn and Felin Hen.

Section 7.22, states "... there are no static caravan, chalet or camping sites in the locality...". This is totally incorrect – in an area of 3km surrounding Coed Wern, there is a (large) site Pont Ogwen chalets (Bethesda); Fferm Dinas caravanning and camping site (Tregarth); Bryn Llys (Coed y Parc) caravan, camping and static caravan site, that has received approval for further development; Tros y Waun (Pentir) caravanning and static caravan site; and also a temporary

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(large) camping site on the fields of Bethesda Rugby Club.

In section 8.2 it is claimed that developing the site “.. will support prosperity within the local community...”. However, section 7.112(4), states “Welcome Packs issued to Guests electronically prior to arrival, encouraging them to order an online shop to be delivered to the Holiday let shortly after arrival”. It is obvious therefore that local food shops (Londis in Bethesda, Blas Lôn Las in Tregarth) will not receive these orders and that it will be Tesco/Asda/Waitrose that will benefit.

Therefore, the Community Council recommends that the application should be refused, for the following reasons:

There is already more than sufficient provision of holiday accommodation (of all types) in Dyffryn Ogwen and the surrounding area.

The local public transport provision is inadequate.

Real risks would arise because of the temptation for occupants to wanderlong a busy road, with no pavement, dark, in the direction of Tregarth or the road in the direction of Llys y Gwynt.

The additional number of car movements in and out of the site would cause risks at the Felin Hen crossroads, also it would affect the residents of the village of Glasinfryn as the road through the village to Bangor does not have a pavement and is extremely narrow and winding.

There is no benefit to local businesses and shops as a result of the development. Indeed, section 7.112(4) makes it clear that the development will be disadvantageous to local businesses. In terms of the lack of benefit to local businesses and shops from the development, the following statements could also be added that are in the new Transport Assessment (December 2022) – the last document in the list is available on Cyngor Gwynedd's website:

3.8 There will be a central block situated near the site access which will act as the main sale/ reception area for the scheme. [...] It is expected that this area will allow prospective holiday makers to buy basic provisions and amenities, as is typical for such developments.

4.11 Guests will be contacted prior to their arrival and issued with a Welcome Pack (detailed below), encouraging them to bring food with them or order an online shop to be delivered to their holiday let shortly after their arrival time, reducing the need to travel off-site.

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I do not have any objections but ask for the following conditions:

P01A – The access shall be laid out and constructed strictly in accordance with the submitted plan.

P05A – The access shall be constructed with visibility splays 2.4 metres by 43 metres on either side. Within the line of the visibility splays nothing more than 1 metre above the level of the adjoining highways shall be allowed.

Natural Resources Wales:

Comments 25.05.2023

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted and also the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of these conditions and/or document we would object to this planning application.

Condition 1: EPS – Lighting Plan

Condition 2: Environmental Management – CEMP

Document - Ecological Surveys & Assessment, Cambrian Ecology Ltd, (Amended 17th April 2023) Protected Species

We've reviewed the updated ecology surveys and assessment report (Cambrian Ecology Ltd, (Amended 17th April 2023)) in support of this application. We are satisfied with the level of survey work carried out, and in general with the conclusions. We advise that the report is included within the approved plans and documents condition on the decision notice.

The report has highlighted an area of dark zone around the periphery of the woodland. However, bats, and other nocturnal wildlife, will equally use the central part of the woodland and pond area, but these will not be covered by a dark zone. A lighting plan has been recommended within the report. However, lighting plans rarely include the effects of all lighting on the site. It should be made clear that a lighting plan should include external lighting, internal lighting through windows, etc and lighting from vehicles.

We advise that a lighting plan be included as a condition within any permission:

Condition 1 – Prior to its installation, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include:

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- Details of the siting and type of external lighting to be used
- Drawings setting out light spillage in key sensitive areas
- Light modelling images to present the night-time effects of lighting on building elevations and ground surfaces from key viewpoints
- Details of lighting to be used both during construction and/or operation

The lighting shall be installed and retained as approved during construction and/or operation.

Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species, habitats and commuting corridors.

Environmental Management

With regards to in-river works, and the creation and dredging of ponds, no method statement has been provided to explain how this will be done without causing discolouration or pollution downstream. We would therefore advise that a Construction Environmental Management Plan (CEMP) be prepared before any proposed development commences. The proposal has the potential to cause pollution/discolouration of watercourses and will potentially generate a significant amount of controlled waste. The CEMP plan should include an explanation of whether there is an intention to block off the inlet and outlet whilst dredging, or over-pumping, or using straw bales or silt fencing / curtains to minimise the risk of discolouration of all watercourses. Should discolouration become apparent, work must stop and working practices be reviewed. The CEMP should follow guidance included within the Pollution Prevention Guidelines and are available at the Netregs website:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

We therefore advise that the following condition also be included within any permission:

Condition 2 - No development or phase of development, including site clearance, shall commence until a site-wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed.

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- 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.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- 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
- Landscape/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: 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.

Ancient Woodland

The application site is adjacent an Ancient Woodland site. We advise that you consult your ecological adviser concerning the ongoing management of the woodland.

Please refer to our Advice to planning authorities considering proposals affecting ancient woodland (published 26 Nov 2021) for

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further information.

Foul Drainage

During the statutory pre-application consultation in relation to the proposed development, there was inconsistency with the method of foul drainage. The applicants have since clarified that the foul drainage of the proposed development will be connected to the main sewer. We are satisfied with the confirmation, and the further revised proposed layout drawing, submitted in support of this application.

Protected Sites

The site lies within 430 metres (north-west) of Moelyci and Cors Ty'n y Caeau Site of Special Scientific Interest, although this was not noted within the Extended phase 1 habitat survey report.

We would expect all construction workers to be aware of the proximity of the protected site and to ensure that the work adheres to the best practice advice contained in the pollution prevention guidance referred to under the 'Environmental Management' section above of our response and in particular to ensure that no materials, machinery, waste or discharge reaches the protected site.

Subject to the above advice being adhered to, we do not consider that the proposal will have a significant effect on the features, functionality or integrity of any Protected Sites.

Historic Landfill

According to our records the proposed development site is located near to land that is, or has been, used for the deposition of waste material (Pant-y-Cyff, which is located on the junction (upstream) of the minor watercourse, and the Afon Cegin). We would therefore advise you to consult with the Local Authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. You should be made aware of the existence of the landfill site(s) so that you can decide whether or not to make your own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

Welsh Water:

Comments 23.02.2023

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

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We would request that if you are minded to grant Planning Consent for the above development that the Condition and Advisory Notes provided below are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets.

Condition

No development shall commence until a hydraulic assessment of the downstream sewerage pumping station has been undertaken to confirm it can satisfactorily accommodate the site and which has been submitted to and approved in writing by the local planning authority. If necessary, a reinforcement scheme the existing sewerage pumping station in order to accommodate the site shall be delivered prior to the occupation of any building. Thereafter, the agreed scheme shall be constructed in full and remain in perpetuity.

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.

Public Protection Unit:

Comments 05.04.2023 – Land Contamination

Contaminated Land Conditions

1. Due to the proximity of the land in the application to a historical landfill site (see the map with the site coloured brown/yellow), the land may be affected by contamination. A desktop inspection will be conducted to assess the feasible contamination risk on the site for the proposed development.
2. Should the recommendations of the desktop inspection indicate that further action is required, a sufficient intrusive investigation will be required to assess the risk of feasible pollution at the site. If necessary, a Remedial Strategy will be incorporated.
3. The Public Protection Service must approve the desktop inspection, the site investigation, risk assessment and any precautionary and/or remedial measures in writing before the commencement of the development.
4. Once the development has been completed, an on-site Completion Report must be provided which will need to be reviewed and approved by the Public Protection Service.

The Public Protection Service have made all reasonable efforts to recommend the most suitable measures regarding potential contamination risks. However, this recommendation should not be taken to indicate that the land is safe or otherwise suitable for this

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development or any other.

The responsibility for assessing if the land is suitable for a specific use fundamentally lies with the developer.

If any contaminated land problems should arise during the development that may disturb the proposed development, e.g. if unusual ground conditions are found, then there should be immediate correspondence with the Public Protection Service.

Every action should be recorded, and the information disseminated to the Public Protection Service regarding site inspections, assessments and remedial work completed, where relevant, and included in the site Completion Report.

Any inspection should follow the procedure of the following documents:

- BS 10175:2011 Investigation of potentially contaminated sites – Code of Practice (British Standards Institution 2011.)
- Planning Policy Statement (PPS) 23: Planning and Pollution Control, Annex 2: Development on Land Affected by Contamination (Office of the Deputy Prime Minister 2004, Published by The Stationary Office).
- Contaminated Land Report (CLR) 11 Model Procedures for the Management of Land Contamination (Environment Agency 2004).
- Land Contamination: A Guide for Developers (Welsh Local Government Association, Welsh Assembly Government & Environment Agency Wales 2006)

Reasons for the conditions

It is considered that the measures are essential to safeguard the site holders and surrounding areas.

Observations 10.02.2023 – Licensing

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

1. Health and Safety at Work etc Act 1974
2. The Caravan Sites and Control of Development Act 1960
3. Model Standards 1989 – Static Caravans – dependent on the definition of the units.

The development must comply fully with licence conditions

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www.gwynedd.llyw.cymru/caravanlicence

4. Definition – Lodges and Pods

Caravan Sites and Control of Development Act 1960

The definition of the lodges and pods is unclear.

Paragraph 1.4 – Proposed Development states that the lodges and anthropods fall under the definition of a static caravan under the Caravan Sites and Control of Development Act 1960.

Paragraph 4.1 states that the units are capable of being moved from one place to another.

Paragraph 4.6 states that the anthropods are capable of being moved from one place to another.

Paragraph 4.9 states that the units are designed to be assembled on site by means of bolts, clamps and other devices.

The definition of both lodges and pods is determined whether they have 'wheels' capable of being towed with a vehicle from one place to another or not. There is no mention of wheels with the lodges or pods.

Should both lodges and pods define them as a 'caravan on wheels', a site license will be required.

Full compliance with the requirements of the license conditions (Model Standards 1989) under The Caravan Sites and Development Control Act 1960 will be required.

If the lodges and pods defined them as a 'structure without wheels', a site licence will not be required.

However, the requirements of the Health and Safety at Work Act 1974, Fire Regulations and other Regulations would apply.

5. Width between units – For any unit with a definition of a caravan with wooden construction must have 6 meters of space between them in accordance with license conditions (Model Standards 1989).

6. Verandah/ Decking – Verandahs may only extend 1.5 meters from the lodges in order to leave 4.5 clear meters of width between the verandas on the next unit in accordance with license conditions (Model Standards 1989).

7. Car parking - One car only may be parked between units in accordance with license conditions (Model Standards 1989).

8. Application for a site Licence following planning approval

Following any planning application that is granted in relation to a

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caravan or tent site under the 1960 & 1936 Acts, it will be necessary for the applicant to apply for a site license and submit a detailed 1:500 scale plan of the site to The Licensing Service. To discuss further, contact the Licensing Enforcement Officer, Pollution Control and Licensing Service, Cyngor Gwynedd on 01766 771000 or licensing@gwynedd.llyw.cymru

Biodiversity Unit/Trees:

Observations in March 2025

In a response to comments from Cyngor Gwynedd's Biodiversity Team, the applicant has submitted a letter written by Lichfields dated 22nd July 2024 on their behalf. In this letter it provides a table of the applicant's team responses.

Below is our response, numbered in relation to the relevant row in the table within the letter.

1. The proposal states that it would provide Biodiversity Net Gain, but this is not possible when part of the woodland would be lost to make a car park, and holiday accommodation. Toads have been found in the site and toads are listed under section 7 of the Environment Act 2016 by the Welsh Government as a species of biodiversity priority.

2. Habitat connectivity will not be retained because this development would fragment the woodland from centre. Human activity within the woodland also would disturb many species reducing the woodlands function for habitat connectivity.

3. The applicant would accept a planning condition for lighting; however lighting is known it create a barrier to bat movement and therefore can further fragment the habitat and without information on proposed lighting and illumination models, it is not possible to assess the impact lighting would have on the woodland and bat species.

The first step is to avoid habitat loss in Welsh Planning Policy under the Stepwise Approach. This proposal will result in 1.4ha of habitat loss.

4. It is the landowner's responsibility to control INNS whether there is a development or not.

5. Woodland condition and value & Biodiversity Net Gain (BNG) Woodland Condition Assessment – this is only relevant to England.

6. Wet woodland irreplaceable habitat – para 6.4.21 in Planning Policy Wales states that woodland is irreplaceable and as a matter of principal the loss of this habitat is unacceptable. The construction of holiday accommodation and car park would result in the loss of the

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trees as well as the ground flora and woodland flowers, invertebrates, fungi and micro-organisms.

7. Loss of tree cover – the applicant states that the revised plan reduces the development area and instead of 1.5ha of woodland clearance it would be 1.4ha. This is still a significant loss of about ¼ of the woodland.

8. Construction impacts – no further response

This development cannot provide net benefit for biodiversity because a ¼ (26-23%) of the wood would be lost. The letter states that 2,240 trees will be planted on site and off site as mitigation, however tree planting does not mitigate the loss of woodland habitat. Woodland creation takes a long time, there is a considerable lag time in trees growing to maturity and establishing complex associations with other woodland species.

The applicant has provided a Green Infrastructure Statement dated November 2024 by Land-Studio. I do not understand why this document on page 12 it refers to reedbeds and lowland fen habitats, the habitat of concern is woodland. This document also refers to Building with Nature Standards and claims that the development follows some of the standards, such as standard 12 and that the development would support nature recovery and help tackle climate change, I disagree. This development would result in the loss of ¼ or more of a woodland which is also a habitat that alleviates climate change by storing carbon in the trees, vegetation and soils; also woodlands help to clean air and alleviate flooding due to the surface area of the vegetation on the roots of the trees. The document lists gravel pathways and parking areas as features that mitigate climate change and I disagree with this.

Human activity in the woodland would further damage the habitat and disturb the species within it.

The applicant has also submitted an Ecological Review Of Coed Wern, Glasinfryn, Bangor dated June 2024 by Soltys Brewster Ecology. This document includes a field survey that was undertaken in December when many woodland plants are not visible. The surveyor undertook a Woodland Condition Assessment and assessed it a moderate, this is not relevant in Wales.

In May 2023 I visited the woodland and I found many ancient woodland indicators such as bluebells, violets and wood anemone.

I continue to object to this proposal to construct holiday lodges and car parking within this woodland because it will result in 1.4ha of woodland habitat lost which is 23-26% of the woodland site. This would result in the loss of biodiversity and habitats that alleviate

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climate change.

The woodland is a candidate Wildlife Site and Gwynedd Planning policies are for the protection of this site and habitat.

Observations 30.01.2024

Coed Wern – trees and Construction report 2022

Including arboriculture method statement and impact assessment

The tree report has been prepared by Rob Marsh Woodland services Ltd, dated Nov 2022 in connection with proposals to build a holiday lodge development in the woodland. It includes assessment of existing trees on the site, recommendations for the protection of trees during the proposed development, and an arboriculture impact assessment.

Report states: The accommodation units are designed to fit in with the woodland context, in close proximity to growing trees. The development will use the existing forest roads as the main access

routes, avoiding the need for large-scale disturbance of the woodland floor. The layout is designed to minimise impact on the woodland itself while taking advantage of existing features such the central

lake area as a focal point.

Buildings and other infrastructure are positioned to entirely avoid disturbance to the larger trees on site and minimise visibility from outside the woodland. Extensive tree and shrub planting is proposed

to enrich the existing woodland and provide appropriate landscaping and screening around lodges.

The report proposes clear felling areas for the development and using a line of “sacrificial trees” to act as a buffer/tree protection barrier on site due to the uneven nature of the topography. I have concerns regarding this approach as it would be difficult to monitor and once work has begun will construction avoid impacting further that these “sacrificial trees”

The method statement does not take into consideration any assessment of damage/impact to trees during the construction of the hard standing for the lodges within the woodland and the instillation

of services to the lodges.

The report recognises that the site is “challenging and uneven ground” in places, how will the creation of levels for the lodges have an effect on the trees and roots, and how will the site / construction be managed?

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The report states that existing forest roads will be used, and that timber wagons will use existing loading bays. How will construction traffic access the lodges that are situated away from the roads without causing damage? How will the materials needed to create bases be moved around the site? As this is likely to be several tonnes of aggregate.

The tree report plays down the biodiversity value of the site as a woodland and focuses on the individual or groups of trees that need to be removed to make the site “productive”.

With the information supplied I cannot see how the development is able to go ahead without significant loss of existing habitat and trees. Although the site has been removed from the Ancient Woodland Inventory, The phase 1 habitat survey recognises that there are wet woodland areas within the site, which are a priority habitat under PPW guidelines

Wet woodland habitat:

- PPW Extract: Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the stepwise approach as set out in paragraph 6.4.21. Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green

infrastructure value including biodiversity, landscape value and carbon capture).

Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.

Currently the development of the site would remove 27% of the tree cover as per the plans submitted. I have concerns that the impact of the development and construction would be greater than those outlined in the finished plan.

All planning applications need to show how the stepwise approach has been followed to reduce impact on biodiversity. Following this, the applicant needs to demonstrate how net biodiversity benefit will be attained. This development will be undertaken within a wet woodland, which is broadly considered as irreplaceable habitat and must be safeguarded.

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It will be wholly exceptional for development to be justifiable in such instances – hence the objection to the application.

Extract from PPW: Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded.

Definition of irreplaceable habitat – Habitats, including the natural resources which underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or

replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples include, ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species rich grassland, long undisturbed soils, blanket bog, salt marsh and lowland fen.

Green Infrastructure Statement.

All mitigation and enhancement for loss of the current habitat must be informed by DECCA / NRW Area Statements / local and national NRAP / Local Green Infrastructure Assessment

The developer will be required to submit a Net Biodiversity Benefit (NBB) Maintenance Agreement which details all management required to attain NBB. – the implementation of this would need to be conditioned with planning consent.

Water and Environment Unit:

Observations 22.02.2023

Drainage Design

The details contained on the Proposed Drainage Layout drawing (dated 27/06/2022 and received 20/12/2022) appear sufficient to deal with surface water generated from the development.

CONDITION: The proposed sustainable drainage system shall be constructed in strict accordance with the details contained on the above plans and described in the Foul and Surface Water Drainage Strategy (A.L.I. Building Design Ltd, received 20/12/2022). Note that we expect for all drains and connections to be positioned as is shown on the above drawing. Any proposed changes to the details shown on the above drawing following commencement of works should be subject to a formal variation.

CONDITION: All elements of the proposed sustainable drainage system, including receiving watercourses and water bodies, are to be maintained and managed in strict accordance with the measures

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outlined in Appendix G of the Foul and Surface Water Drainage Strategy (A.L.I. Building Design Ltd, received 20/12/2022) throughout the lifetime of the development.

Flood Risk

Consider the nature and scale of the development we are satisfied with the level of detail contained in the Flood Consequence Assessment Report submitted with the application (Phil Jones Consultancy, October 2022).

CONDITION: All recommendations contained in section 4 of the FCA should be incorporated into the proposed development.

Working near watercourses

INFORMTIVE: Numerous watercourses flow through the proposed development site. We have no record of flooding associated with these watercourses, however the developer is advised to avoid placing / erecting any structures within 3m of the channels as this may hinder future maintenance. In addition, any works which could affect the flow of the watercourse, including any structures within the channel or the provision of a culvert, may require Ordinary Watercourse Consent – please visit the Council’s website for further advice.

<https://www.gwynedd.llyw.cymru/en/Residents/Parking-roads-and-travel/Flooding/Ordinary-watercoursesland-drainage-consent.aspx>

The ultimate responsibility for future maintenance of the watercourse, including the banks, rests in perpetuity with the riparian owner.

North Wales Police, Crime
Prevention by Design
Consultant:

Comments 13.02.2023

Have reviewed the amendments to the plans and nothing to add for now.

Welsh Government, Economy
and Infrastructure Department:

Comments 28.02.2023

I refer to your consultation of 10/02/2023 regarding the above planning application and advise that the Welsh Government as highway authority for the A5 trunk road does not issue a direction in respect of this application.

Language Unit:

Not received.

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Fire and Rescue Service:

I acknowledge receipt of the notification to the North Wales Fire and Rescue Authority in relation to the above application.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee. It is important that these matters are dealt with early on in any proposed development:

- The following concerns are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.

There is insufficient information regarding access and water supplies for the development. Your attention is required to the details in Section 16 and Section 17 of the Approved document B

CADW:

Comments 12.09.2018

Having carefully considered the information provided with this planning application, we have no objections to the proposed development. Our assessment of the application is given below.

Assessment

Located within a 3km buffer of the application area are:

Scheduled monuments

CN056 Rhiw Goch Camp

CN119 Sling Burial Chamber

CN120 Pen Dinas Camp

CN153 Henge Monument and Cursus

CN176 Coed Uchaf Hut Group

CN192 Gerlan Hut Group

CN195 Caer Pencraig Fort

CN202 Parc Gelli Hut Group and Ancient Fields

CN252 Hut Circle Settlement NW of Tan-y-Marian

CN268 Enclosed Hut Circle Settlement at Cororion Rough

CN287 Hut Circles West of Corbri

CN374 Moelyci cairn

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CN393 Carnedd Howel Round Cairn

Registered historic parks and gardens

PGW (Gd) 40(GWY) Penrhyn Castle (grade II*)

The proposal is for 40 lodges, a reception building and creation of two water features, together with the associated access roads & parking areas, landscaping, and other associated works set within woodland that currently occupies the site.

The nature of the site means that the proposed development will be largely screened from view by existing woodland except from potential higher altitude vantage points. The surrounding topography means that none of the scheduled monuments or the registered historic park and garden are sufficiently elevated and/or have unobstructed views towards the proposed development, or else are at too great a distance, for there to be any more than very slight and not significant effect to any of their settings.

Comments 16.02.2023

Since that advice was given the Slate Landscape of Northwest Wales has been inscribed as a World Heritage Site with the boundary of the Penrhyn Slate Quarry and Bethesda, and the Ogwen Valley to Port Penrhyn section being adjacent to the application area.

The submitted amended application includes a Heritage Impact Assessment prepared by Lichfields and a visual appraisal and landscape strategy prepared by Land Studio. These works have demonstrated that the amended layout of the proposed development along with the existing and proposed surrounding vegetation will ensure that it will not have an impact on the setting of the World Heritage Site or any of the other designated historic assets. We concur with the conclusions of these reports and therefore have no objections.

Rights of Way Unit,
Transportation and Countryside
Service:

Comments 16.02.2023

Comments – I refer to the above-mentioned application. No recorded Rights of Way appear to be affected by this proposal.

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Public Consultation:

A notice was posted in the press and on the site and nearby residents were informed. The advertising period has already expired, and correspondence was received objecting on the following grounds:

- Felling of trees and the impact on trees
- Loss of ancient woodland
- Impact on biodiversity.
- Flooding
- Traffic
- Road safety
- Lack of infrastructure
- An excess of holiday units
- Over-development
- Impact on local communities
- Impact on the Welsh language
- Contrary to the aim and objectives of the Cyngor Gwynedd Sustainable Visitor Economy Plan
- Impact on amenities and the privacy of nearby houses.
- Over-tourism

It is noted that over 5000 e-mails were received as a result of completing the on-line form on the Woodland Trust site, objecting to the application on the basis of the loss of ancient woodland.

5. Assessment of the relevant planning considerations:

The principle of the development

5.1 This proposal is to provide holiday accommodation and associated work on a plot of land known as Coed y Wern, Tŷ Gwyn to the southeast of the village of Glasinfryn. The proposal includes 25 holiday lodges together with 4 glamping pods in a woodland. Policy TWR 3 states that proposals for the development of new static caravan sites or new holiday chalet sites or permanent alternative camping accommodation will be refused within the Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas. In other locations, proposals for new static caravan or holiday chalet sites and permanent alternative camping accommodation will only be granted where:

- i. It can be demonstrated that it does not lead to a significant excess in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and
- ii. That the proposed development is of high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where units can be readily assimilated into the landscape in a way that does not significantly harm the visual quality of the landscape; and
- iii. That the site is close to the main roads network and that adequate access can be provided without significantly harming landscape characteristics and features.

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- 5.2 The site is not situated within the AONB or within a Special Landscape Area and therefore the criteria in this policy are relevant. 1i) specifically refers to an excess of new developments. In order to define 'excess in this context you should refer to the paragraph of explanation in 6.3.69 that refers to the 'Anglesey, Gwynedd and Eryri National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within each Landscape Character Area (as defined by the Gwynedd Landscape Strategy (2012)), the landscape's capacity is assessed to ascertain the capacity of the local landscape for further developments of holiday chalets or caravans.
- 5.3 This specific development falls within the ACD01 Landscape Character Area (Bangor Coastal Plain). The Landscape Sensitivity and Capacity Study notes the indicative capacity for the Landscape Character Area. Specifically in relation to the relevant ACD to this application it is noted "Within each area that contributes towards the setting of the National Park there is typically no capacity for static caravan park/holiday chalet developments. However, outside these areas there could be limited capacity for small to micro caravan/holiday lodge park developments that are well located and developed." The Study defines micro developments as ones up to 10 units and small developments between 10 - 25 units. Therefore, appropriate consideration will need to be given to the scale of the proposed development in the location in question. It is noted that the number of units have now been reduced to a total of 29 (25 lodges and 4 holiday pods). It is recognised that this figure is higher than what is defined as a small development in the Capacity Study, however as the Study gives consideration to the average capacity of areas rather than individual locations, consideration needs to be given to the site in question and it is noted that the site is concealed. To this end, it is therefore considered that there is capacity for the site in this specific area.
- 5.4 1ii) refers to the design, layout and appearance of the proposed development. The policy states that new developments should be located in an unobtrusive location. Within the Plan, an unobtrusive location is described as one which is well screened by existing landscape features or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape. Policy AMG3: 'Protecting and improving Features and Qualities which are unique to the character of the local landscape' states that proposals must demonstrate that they do not have a significant adverse impact upon features and qualities which are unique to the local landscape in terms of visual, historic, geological, ecological and cultural aspects. Furthermore, Policy PCYFF 4: 'Design and Landscaping', states that all proposals should integrate into their surroundings. Proposals that have not given consideration to landscaping matters from the outset as part of the design proposal should be refused.

In the context of the Glasinfryn cluster the proposed development is comparatively large in scale, and appropriate consideration needs to be given to how the development would blend in with the landscape and the local built form.

- 5.5 As noted above, the site is located within an existing woodland and the number of units together with the scale of the development has now been reduced to a total of 29 units, and it is proposed to retain and control the vegetation surrounding the development in the centre of the site so that it would be screened from public places. To this end, the proposal would not appear built, and consideration has been given to landscaping from the very beginning. A further assessment regarding historical, ecological and cultural matters is further on in the report. Therefore, on the above basis, it is considered that the proposal complies with the requirements of criterion 1ii) of Policy TWR3 together with the relevant sections of policies AMG3 and PCYFF 4.

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- 5.6 Criterion 1 (iii) refers to the provision of adequate access which can be provided without significantly harming landscape characteristics and features as well as ensuring that the site is close to the main highways network. The entrance to the site already exists and the proposal intends to improve this and provide a visibility splay. It is noted that a strip of trees on the boundary with the main road that leads to Glasinfryn is protected under a Tree Preservation Order and there is an agreement to retain two trees either side of the entrance, but apart from this that a visibility splay is provided either side of the entrance. The Transportation Unit has confirmed that the proposal is acceptable subject to conditions and therefore it is considered that the proposal is acceptable in respect of this criterion. Therefore, it is considered that the proposal complies with the relevant requirements of policy TWR 3.
- 5.7 It is noted that concerns about the cumulative impact have been raised in the objections to the application and in recent Committees in terms of the numbers and the site's proximity to nearby static caravan sites. Although there are several static and touring sites in the vicinity, the area in question is not considered to be an example of a location that is under extreme pressure from such tourism developments. The cumulative impact has been assessed in accordance with the requirements of planning policy TWR 3 in paragraphs 5.2 - 3 above. In addition, the criteria within policies TWR 3 themselves respond to the cumulative impact in the sense that sites in obtrusive places that are not close to the main roads network should not be permitted. Even during the winter months the site is considered well screened by the existing landscape features, and should the application be approved it is proposed to better manage the woodland. In paragraph 6.3.81 of the policy, it states that caravans should not be permitted in open settings near the coast or in Areas of Outstanding Natural Beauty. The site is located away from an open coastal location and there is no landscape designation in the vicinity. It is not considered that the development would appear excessive or harmful to the landscape at this site.

Visual, general and residential amenities

- 5.8 The site is located within woodland, and it is proposed to establish the development in the middle of the site around a small pond. It is proposed to retain and manage the rest of the woodland and therefore the site is currently screened and is natural. Houses are located to the North (Bro Infryn Estate), to the East (Railway Cottages) and to the South (Felin Hen Farm and Tyddyn-y-Felin). Bro Infryn Estate abuts the woodland while the Railway Cottages and Felin Hen Farm are located on the other side of the A4244. Due to the location of the holiday units within the site and the existing vegetation it is not considered that the proposal would be visible from any house or the nearby main road. It is possible that it would be visible from the footpath that crosses the A4244 due to the height of the bridge that crosses the road immediately near the site. It is noted that objections have been received on the grounds of the impact of the development on the amenities of nearby residents including their privacy, however, it is not considered that the proposal would have an adverse effect on the residents because of the location and scale of the proposal together with the vegetation surrounding the site.
- 5.9 It is noted that the proposal involves the erection of a reception/sales building near the entrance to the site and use an existing e-bike hub building. The details of these buildings have not been submitted as part of the application but considering their small scale it is considered that a planning condition to agree the details of these buildings would be acceptable. Based on the distance and the concealed nature of the site, it is not considered that the proposal would have a substantial detrimental impact on any nearby residents. It is considered that the proposal is acceptable in terms of policies PCYFF 2, 3 and 4 of the LDP that deal with protecting the general visual amenities of nearby land users.

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- 5.10 The whole site is within the Dyffryn Ogwen Landscape of Outstanding Historic Interest, and the scheduled monument of the Penrhyn Quarry Railway is located on the Eastern boundary of the site. CADW have confirmed in their comments that the proposal would be unlikely to have a significant detrimental impact on the World Heritage Site designation or any other heritage asset. On this basis it is not considered that the proposal is contrary to the requirements of policies PS20 and AT1 of the LDP.

Transport and access matters

- 5.11 There is existing access into the site from the existing Class III highway that leads to Glasinfryn. The intention is to improve this entrance and use it for the development. A Transportation Statement has been submitted with the application and the Transportation Unit has proposed observations on the proposal and confirmed that there is no objection subject to imposing conditions on any planning permission.
- 5.12 The entrance to the site is located approximately 100m away from the A4244 highway down the Class III Road towards Glasinfryn. The plans note the intention to prohibit guests from turning right when leaving the site and therefore they will not be able to travel directly through Glasinfryn and will only be able to travel towards the A4244 when leaving the site. It is not considered that the proposal would cause substantial disturbance to the area's residents on the grounds of traffic nor highway safety, and that sufficient measures have been included in the proposal.
- 5.13 Based on the above, in addition to what is being proposed in the application and the planning conditions to ensure road safety, it is considered that the proposal is acceptable in terms of policy TRA 4 of the LDP.

Biodiversity matters

- 5.14 The following documents have been submitted as part of the application:

- Ecological Review – Coed Wern Rev 3 03.03.2025
- Coed Wern Green Infrastructure Statement 03.03.2025
- Coed Wern response to the observations of the Biodiversity Unit 24.03.2025
- Coed Wern response to the observations of the Biodiversity Unit 22.07.2024
- Coed Wern response to the observations of the Biodiversity Unit 11.05.2023
- Trees and Development Report 24.11.2022 Rob Marsh Woodland Services Ltd
- Ecological Assessment and Survey, Cambrian Ecology 16.11.2022
- Trees Report L. O'Connor September 2017
- Extended Phase 1 Habitats and Protected Species Survey, Cambrian Ecology 2018

- 5.15 The Phase 1 Habitats Survey in 2018 disclosed that most of the site is dominated by regenerated broad-leaved natural woodland and what used to be a commercial coniferous plantation. This plantation was screened from the nearby minor road by a high beech hedge that is protected by a Tree Preservation Order. The birch trees that dominate within regenerated woodlands exist here and they have reached the 'closed canopy, prior to thinning' stage where light is blocked out and impacts the flora on the ground. In addition, the site also includes access tracks that have been in existence since 2003 and 2005 and since then they have developed to be neutral grassland. There is also a small area of scrub and wetland, both of a very low ecological or botanical value and interest due to the lack of botanical diversity and unsustainable size. The pond in the middle of the site is fed by a small water course that runs in a northerly direction, in due course joining afon

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Cegin outside the northern boundary of the site. The main ecological matters on the site are the significant presence of invasive non-native species (INNS) together with the absence of Management of the site. This combination currently leads to the continuous degradation of all the habitats on the site. The presence of toads and frogs were found on the site together with bats, specifically around the pond area, together with a bats roost in the existing building on the site which is to be retained without disturbing the roost. The survey makes recommendations for management to reverse the degradation of habitats, remove the INNS and ensure that bats will not be prevented from moving through the site by inappropriate lighting from the proposed development. There is also an intention to improve the woodland habitat with new planting to work alongside the reintroduction/local conservation of red squirrels project that is implemented in the local area and has direct habitat links with this site. The proposals are an opportunity to introduce useful management systems which make the most of the biodiversity of this site. It is noted that without introducing a sympathetic management system, the site will continue to degrade and strikingly a series of INNS would soon dominate all the habitats.

- 5.16 Later on an Ecological Assessment and Survey by Cambrian Ecology were submitted in 2022, where it was recorded that the tracks that had been designated as neutral grassland were now earmarked as tall ruderal, with the grassland having lost the competition against other species. No open water was found in the pond during 2021 or 2022, but there is a record of water in the pond from an aerial photograph in April 2022. Common bats, toads and frogs continue to be present on the site. Overall, the survey confirms that the flora and grassland habitats are under threat because of lack of management of the INNS.
- 5.17 The Trees Report notes that the site is located in a wet area that used to be a coniferous plantation which has already been cleared. Drainage is in place to an extent but signs of a lack of maintenance can be seen. Wetter areas of the site have a higher percentage of Alder re-growth. The re-growth is natural and is likely to be approximately 30 years old. The woodland of the same age is mainly dominated by innovative Birch species. There is also a lesser percentage of other broadleaved species including Alder, Willow, Sycamore, Oak, Hazel, Elder, Hawthorn across the whole area. There are no ancient trees on the site. It is noted that the site was originally included on Natural Resources Wales's records of ancient woodlands, but the record has been updated and this site has been removed from the record. It is noted that the site borders an ancient woodland. As noted in the table of consultations a high number of objections were received on the grounds of the loss of ancient woodland, however the proposal no longer entails any loss. The proposal would aim to enhance the variety and age status of the woodland with silvicultural techniques. The trees would have a larger diameter and in a form that would preserve better, and any mature trees will be retained as a future seed source. Smaller diameter birch will be thinned out to encourage new trees from planted stock or nearby trees of different species in accordance with local red squirrel conservation efforts. Measures to mitigate and manage the future woodland and trees are noted in the report. There is no intention to undertake any work to the protected trees on the Western boundary of the site. A Trees and Development Report has been submitted that elaborates on the arboriculture method and impact assessment that confirms the status of the site and that it is not ancient woodland as noted above.
- 5.18 It is noted that there has been an extensive discussion regarding biodiversity matters and trees in the context of this development and in response to this an additional Ecological Survey was completed in 2024 taking into consideration the comments made by the Biodiversity and Trees Unit together with the requirements of the latest National Policy that includes changes to Chapter 6 of Planning Policy Wales in terms of biodiversity enhancements and using the step-wise approach. Consequently, the development area originally identified as Zone 5 has been removed

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from the proposal and a revised site plan has been submitted to confirm this. This means that the size of the development site is reduced together with the number of units as confirmed in paragraph 1.1. It is noted that the information submitted as part of the application emphasises the need to proactively manage the site to protect and enhance the biodiversity that exists there, rather than leaving the site to develop naturally.

5.19 The latest comments of the Biodiversity and Trees Unit have been noted in the above consultations table and are summarised below:

- It is not possible to provide a Biodiversity Net Gain as parts of the site will be lost to the holiday units and car park. The first step according to the stepwise approach is to avoid the loss of habitats. There is a loss of 1.4ha of habitats including wetland habitat.
- The development would split the woodland along its middle and introduce human activities and therefore it would not be possible to provide linked habitats.
- It is not possible to assess the impact of light on the bats, although the developer is willing to accept a condition to control lighting.
- It is the responsibility of the landowner to control INNS should there be a development or otherwise.
- Woodland Condition and Value Assessments and Biodiversity Net Gain apply to England only.
- The trees method statement does not give consideration to any harm to trees during the development work including installing hard standings, and the services, deliveries etc.
- The trees report does not recognise the importance and value of the site's biodiversity.

5.20 The agent has provided a further response to these observations (24/03.2025) that briefly notes the following:

- The proposal has considered the stepwise approach noted in Chapter 6 PPW, and the method gives recognition to plans that include the loss of habitats and give opportunities to mitigate and enhance.
- The retained habitats would link across and up and down the site and would be available for a wide range of biodiversity.
- Happy to agree on a lighting scheme and an Environment and Development Management Plan
- The landowners are aware of the need to control the INNS from spreading beyond the site, but controlling the INNS within the site is different.
- It is recognised that some assessment methods that apply to England have been used, but this adds to the information that is available.
- Parts of the site have now been removed from the development to reduce the impact, but these sites need to be managed to enhance the biodiversity that exists here already and there are no schemes in place to currently manage the site.
- The proposed development will create a woodland of better quality that is retained and created from anew.

5.21 It is also noted that the amended Green Infrastructure Statement (April 2024) confirms that the current site contains a little over 5ha of woodland and approximately 0.8ha of wet woodland and 0.17ha of hardstanding (the existing tracks). As a result of this application there will be an overall net loss of 1.17ha habitat that may be split into 0.04ha of wet woodland and 1ha woodland. It also includes a net increase of 793m square of hard standing. There will be no change to the existing pond in the middle of the site.

5.22 The Green Infrastructure Statement also emphasises that a management plan will be implemented across the site to raise the overall quality of the woodland. The loss of woodland habitat is mitigated by managing the area retained and the planting of broadleaved trees at a ratio that

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corresponds to what is noted in PPW. Based on the loss of 1.17ha it is intended to plant approximately 1872 trees, and from that number 806 trees will be provided in the buffer zone to the north/northeast of the site together with an additional number of trees (up to 312) within the red line boundary. The remaining mitigation planting work (approximately 745 trees) will be provided off-site in locations to be agreed with the LPA. There would also be additional management areas within the site as follows:

- Improving retained wet woodland through management and new planting 0.74ha.
- Improving retained woodland through management and new planting as above 4ha.
- Improve the pond via methods to manage the spread of scrub on the verges and supplementary planting with native emerging/marginal species 0.1ha.

5.23 It is noted that Natural Resources Wales are satisfied with the proposal subject to lighting conditions to ensure that any impact on bats is minimal, and a condition to agree on an Environmental Management and Development Plan.

5.24 As a result of the above, the concerns of the Biodiversity and Trees Unit are acknowledged and it is considered that the applicant has given full consideration to the impact of the development on the woodland, and that the mitigating measures and biodiversity enhancements proposed (that will be subject to a planning condition to submit full details) will be sufficient and comply with the requirements of the stepwise approach within Chapter 6 of PPW. It is considered that the surveys submitted convey the current situation of the site and highlight the need to manage the woodland to ensure the future of the habitat and the biodiversity within. The site has not been designated as a site of National importance and it is recognised that it is a wildlife site, but it is considered that the applicant has addressed the site's needs and that as a result of this development it will be managed and enhanced subject to planning conditions. The likelihood that the landowner will invest to enhance the site's biodiversity quality otherwise is very slim, and it is not possible to force him to do this outside the planning system.

5.25 Therefore to this end, having weighed up all the assessments and surveys as well as the comments of the Biodiversity and Trees Unit and Natural Resources Wales, it is considered that the proposal is acceptable subject to appropriate conditions and that it is in compliance with the requirements of policies PS19, AMG 3 and 5 as well as Planning Policy Wales.

Sustainability matters

5.26 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 opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport, in accordance with Strategic Policy 4" (Bullet point 12, Policy PS 5)".

This is supported by bullet point 4 of Policy PS 14 (The Visitor Economy).

5.27 It is considered that the policies of the LDP are consistent with local and national planning policies in terms of how it deals with sustainable development principles.

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- 5.28 Although it is recognised that a percentage will use private vehicles to reach the site it is considered that the site is close enough the Bangor train station to enable guests to use the railway and then a taxi to reach the site. Different options are available for using alternative modes of transport once they have reached the site including cycling, public transport and on foot.
- 5.29 It is noted that the Lôn Las Ogwen footpath runs immediately past the site and that the site is located on a bus route with bus stops and a train station in the centre of the town, and there are many facilities and attractions available in Bangor. In the context of all the material planning considerations, it is considered that the location of the site is sustainable and acceptable in relation to the requirements of policies PS4, PS5 and PCYFF 5 of the LDP, and complies with the advice included in TAN 18 and PPW.

Flooding matters

- 5.30 Since submitting the application, the Welsh Government has published a revised TAN 15 on 31 March 2025. The revised TAN 15 is titled 'Development, flooding and coastal erosion' and Circular 002/2025 'Guidance on The Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025', 'The Town and Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025' and 'Main Plan (Wales) Direction 2025' have been published.
The Government's Planning Directorate.
- 5.31 Section 1 of the new TAN 15 states "This document replaces Technical Advice Note 14, published in 1998 and Technical Advice Note 15, published in 2004. Development Plans and planning decisions should no longer refer to those documents."
- 5.32 However, the clarification letter states that "...the publication of new guidance could have an impact on the processing of planning applications therefore there will be a transitional period for the implementation of the TAN. Planning applications submitted and registered prior to the publication of the new TAN will continue to be assessed against the previous version...".
- 5.33 Therefore, official guidance from the Welsh Government for planning applications submitted and registered before 31 March 2025 for flood risk assessment is to be made on the content of the 1st edition of the TAN 15 policy published in 2004.
- 5.34 In this case the site is located within Flood Zone A and on the flood maps for development (DAM maps) with a small part of the most northerly area of the site (that will not be developed) forming part of the Zone 2 Rivers designation. Natural Resources Wales have no comment on the flooding situation or the Flooding Consequences Assessment submitted as part of the application, but it appears that surface water flooding is the concern here. The Land Drainage Unit have responded and confirmed that, considering the nature and scale of the proposal, they are satisfied with the details included within the Flooding Consequences Assessment submitted as part of the application and suggest a condition that would ensure that the measures included within section 4 of the Assessment are undertaken as part of the development.
- 5.35 Based on the above, it is considered that the proposal is acceptable and that it complies with the requirements of policy PS6 of the LDP, as well as Technical Advice Note 15: Development and Flood Risk (2004).

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Infrastructure matters

- 5.36 It is noted that the comments of Welsh Water refer to the need to ensure that the sewage pumping station is installed down river before the development can proceed. Welsh Water have placed the onus of ensuring this on the developer and are satisfied with the proposal subject to a planning condition that ensure that the station is assessed, and that improvements are provided if need be prior to the commencement of the site development. To this end it is considered that the proposal complies with the requirements of Policy PS2 and PCYFF 6 of the LDP.

Language Matters

- 5.37 In accordance with the Planning (Wales) Act 2015, it is a duty when determining a planning application to consider the Welsh language, where it is relevant to that application. This is reiterated further in para 3.28 of Planning Policy Wales (Edition 11, 2019), along with Technical Advice Note 20.
- 5.38 The Supplementary Planning Guidance (SPG) 'Maintaining and Creating Distinctive and Sustainable Communities' (adopted July 2019), provides further guidance on how it is expected for Welsh language considerations to be incorporated in each relevant development. This proposal does not reach the thresholds for submitting a Welsh Language Statement or a Report on a Welsh Language Impact Assessment; however, the guidance included within Appendix 5 notes that every retail, commercial or industrial development where a Welsh Language Impact Statement/Assessment is not required should show how consideration has been given to the language.
- 5.39 A Welsh Language Statement was submitted to support the application explaining how the Welsh language was considered when formulating this plan, noting the following points:
- Although the site is within the Llandygai Community Council area, it is felt that it is more appropriate to base the assessment on the Pentir ward as the nearest village (Glasinfryn) is within the Pentir ward.
 - There will be opportunities for work during the period of developing the site and it is proposed to employ 1-2 people once the site is operational.
 - It is considered that local businesses in Bangor and Bethesda would benefit from the development once it has been completed.
- 5.40 The statement concludes by stating that although the plan would introduce non-Welsh speakers to the site which may have a medium impact on the use of the Welsh language in the community, the number of units and the expected number of visitors would be small in relation to the size of the local population; visitors to the existing site will not be in the local community for extended periods and therefore any impact would be temporary, brief and minimal on the local community. As such, the statement considers that it may be possible for the proposal to have a minor negative impact on this and would be offset by the advantages to the local community because of more employment opportunities offered by visitors spending in the area. In addition, steps are being taken to increase awareness of the Welsh language, heritage and the area's history, which will be of assistance when raising awareness of visitors to the site of the history and local culture and

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features of the area, including the Welsh language, which will therefore help to improve awareness and sensitivity of the area's culture and language to visitors.

This would be a beneficial impact of the proposal. It is also noted that planning conditions would be imposed on any planning permission which would ensure that a Welsh name would be provided for the site and ensure bilingual signage within the site and when advertising the site.

- 5.41 It is deemed that sufficient information has been submitted to satisfy the requirements of policy PS 1 and the SPG in terms of demonstrating that the Welsh language has received appropriate consideration in creating this proposal and a Welsh name and mitigation measures can be ensured by imposing conditions.

Response to the public consultation

- 5.42 Many observations were received in response to a public consultation on the application, and they are listed in the above consultations table. The observations have already been addressed in the report, and it is not considered that they change the assessment.

6. Conclusions:

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

7. Recommendation:

- 7.1 To delegate powers to the Senior Planning Manager to approve the application, subject to
1. Time
 2. In accordance with the plans
 3. Restrict the number of units to 25 chalets and 4 pods
 4. Holiday use only and maintain a register
 5. A Landscaping Plan to be agreed and implemented in the first planting season following approval.
 6. Agree on electricity and water utilities route
 7. Construction Work Hours
 8. Welsh name
 9. Bilingual Advertisements
 10. The access must be planned and constructed in full accordance with the submitted plan.
 11. The access shall be constructed with visibility splays 2.4 metres by 43 metres on either side. Within the line of the visibility splays nothing more than 1 metre above the level of the adjoining carriageway shall be permitted.
 12. Lighting plan
 13. Agree on a Construction Environmental Management Plan
 14. Welsh Water Condition
 15. Contaminated Land Conditions
 16. Land Drainage Conditions.
 17. Details of reception/sales building and e-bike hub to be agreed

Notes

1. SUDS
2. Land Drainage Unit
3. Licensing