

PLANNING SUPPORT STATEMENT

**Proposed Siting of 34 No. lodges, Reception Building, Together with the
Formation of Associated Access & Access Road & Parking Areas,
Landscaping, and Other Associated Works
at
Dafarn Newydd, Llangefni**

**Prepared on behalf of
Anglesey Lodge and Caravan Park Ltd**

Agents Ref: - 1118/12/17



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PLANNING SUPPORT STATEMENT

LAND KNOWN AS DAFARN NEWYDD, LLANGEFNI: PROPOSED SITING OF 34 NO. LODGES, RECEPTION BUILDING, TOGETHER WITH THE FORMATION OF ASSOCIATED ACCESS & ACCESS ROAD & PARKING AREAS, LANDSCAPING, AND OTHER ASSOCIATED WORKS

1.0 INTRODUCTION

1.1 The purpose of this Planning Support Statement is to examine the key material planning considerations, including National & Local Planning Policy, in order to demonstrate the acceptability of this proposal.

1.2 Overall, it is concluded that it would make use of an area of land that is visually well-contained and which is set in a suitable and highly accessible location adjacent to a key urban settlement in the County to accommodate a high quality and attractive lodge development that would be suited to its setting and the wider locality in terms of its scale, form, and design, and its minimal and entirely addressable impact upon the landscape. There would be clear and substantial economic benefits, which are particularly important to helping to sustain the local community and the facilities and services that it relies upon. It is clear that the scheme would also have an acceptable impact upon residential & general amenities, the operation & safety of the highway, biodiversity, and all other material considerations.

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2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The site is situated in a rural location directly to the north of Penmynydd Road and a short distance to the east of the newly built Llangefni Link Road.
- 2.2 The site is a substantial open field that is set within well-defined boundaries effectively on the edge of the built form of Llangefni.
- 2.3 The site is defined on its Frontage/southern edge by a substantial hedgerow, which screens and separates the site from Penmynydd Road which directly adjoins the boundary. An existing substantial pull-in/layby is also set on this boundary and provides access into the site. Opposite, is another substantial hedgerow that further separates the site from the agricultural land to the south, with the eastern most extent of industrial estate a short distance beyond.
- 2.4 The western edge of the site is defined by a substantial band of large mature trees and other vegetation that offers a high degree of screening and visual containment to the site and separates it from the adjoining agricultural land (subject to a consent connected to the development associated with Coleg Menai) and a 'pond' that appears to form part of the link road drainage system. The Llangefni Link Road is set a short distance beyond with the main bulk of Llangefni town set behind that.
- 2.5 A mature hedgerow also forms the northern edge of the site, with this also offering a good degree of visual containment to the boundary and separating the site from the open agricultural land beyond.
- 2.6 Finally, the eastern boundary is also formed by a hedgerow and trees, which separate and visually contain the site from the adjoining field. Approximately 220m to the east is Dafarn Newydd, which is sizeable a dwelling, together with its associated workshop building, yard, and holiday letting units.
- 2.7 From the above it can clearly be seen that the site is set in a well contained location that is on the edge of the built form of Llangefni and well placed in respect of the local highway network.

3.0 PROPOSED DEVELOPMENT

3.1 The proposal is a full application for the following development:-

- Siting of 34 no. lodges together with associated decking and off-road vehicle parking areas (for 2 cars per unit);
- Siting of a reception building;
- Formation of an improved access to serve the site, together with a pedestrian 'link' onto the existing Llangefni Link Road network to the west;
- The following associated development in connection with the above:-
 - Formation of an internal access road to serve the proposal, together with field accesses to adjoining land;
 - Formation of a visitor parking area (near to the entrance onto the main site as per the submitted plans);
 - Provision of a comprehensive soft landscaping scheme across the site (please see submitted documents for greater detail), inclusive of a natural paly area;
 - Installation of a surface water drainage system inclusive of the formation of a surface water drainage pond, and installation of a pumping station and connection to the existing sewer for foul drainage together (see submitted drainage documents and plans for greater detail); and,
 - Other associated minor works as per the submitted documents.

3.2 As part of the submission the following documents have been supplied which detail the development proposed:-

- Location plan - Ref:- 2621:18:1 - Scale:- 1:2500 @ A3
- Existing site plan - Ref:- 2621:18:1 - Scale:- 1:1250 @ A2
- Proposed layout - Ref:- 2621:21:3B - Scale:- 1:1000 @ A3
- Proposed office/reception lodge plan - Ref:- 2621:15:14A - Scale 1:100 @ A3
- Proposed one bed timber lodge plan - Ref:- 2621:15:6A - Scale 1:100 @ A3
- Proposed two bed timber lodge plan - Ref:- 2621:15:9A - Scale 1:100 @ A3
- Proposed three bed timber lodge plan - Ref:- 2621:15:10 - Scale 1:100 @ A3
- Proposed four bed timber plan - Ref:- 2621:15:10 - Scale 1:100 @ A3
- Landscape documents as follows:-
 - Landscape and Visual Impact Assessment - Dated:- December 2021
 - Landscape general arrangement - Ref:- 001 C - Scale:- 1:1000 @ A3
- Transport Statement - Ref:- GW/AM/190776/TS/2 - Dated:- 21/12/2021, inclusive of the following plans:-
 - Proposed site access and highway improvements plan - Ref:- SCP/190766/F01A - Scale 1:1000 @ A3
 - Swept path assessment of max legal articulated vehicle plan - Ref:- SCP/190776/ATR01 - Scale:- 1:250 @ A3
 - Swept path assessment of large refuse vehicle (4 axle) - Ref:- SCP/190776/ATR02 - Scale:- 1:500 @ A4
- Drainage documents as follows:-

- Drainage Assessment - Dated:- 23/12/2021
 - Proposed foul and surface water drainage layout - Ref:- 4683 C100 P5 - Scale:- 1:500 @ A1.
 - BS5837:2012 Tree Survey, Arboricultural Implications Assessment & Method Statement - Ref:- 21435/AIA/AMS/A2 Rev A - Dated:- Jan. 2022, inclusive of the following plans:-
 - Tree Constraints Plan - Ref:- 21435/A1/TCP/01;
 - Tree Protection Plan - Ref:- 21435/A2/TPP/01;
 - Preliminary Ecological Assessment - Dated:- 20/04/2020;
 - Archaeological Desk-Based Assessment - Ref:- 3467.R02 - Dated:- November 2019
 - Letter of support from Hoseasons - Dated:- 09/11/2021
 - Planning Support Statement - Ref:- 1118/12/17 - Dated:- December 2021
 - Community & Linguistic Statement - Ref:- 1118/12/17 - Dated:- December 2021
 - Design & Access Statement - Ref:- 1118/12/17 - Dated:- December 2021
 - Water Conservation Statement - Ref:- 1118/12/17 - Dated:- December 2021
- 3.3** Also, as the proposal constitutes a 'Major Development' it will be subject to statutory pre-application consultation. Details of the responses received and an explanation of the manner in which these have been addressed will be provided in the Pre-Application Consultation (PAC) Report submitted as part of the application as per the DMPW (Amendment) Order 2016 requirements.
- 3.4** Finally, the proposal has been subject to a pre-planning enquiry (PPE) (ref:- PALM/2020/5 - Dated:- 15/01/2021) with the Local Planning Authority, with feedback from those discussions influencing the proposal as presented. Details of that pre-planning enquiry and any subsequent discussions will be examined where relevant in section 5 of this report when addressing the key material issues for the application.

4.0 PLANNING POLICY CONTEXT

4.1 There are a number of policies relevant to this proposal. These are briefly detailed below, with the following section summarising the key material considerations for the proposal and referring to the relevant policy where required:-

NATIONAL PLANNING POLICY

Planning Policy Wales (PPW) 11th Ed. (2021)

4.1 Chapter 2 of PPW brings into policy the concept of Placemaking which is considered to be fundamental to the goals of the planning system. The key principles underlying placemaking are set out in this section.

4.2 Chapter 2 also sets out, and in particular Figures 4 and 5 and the accompanying text, the general planning and sustainable place marking principles which are intended to underpin decision making for all development. In particular the principles of:-

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating accessible and healthy environments
- Creating and sustaining communities
- Maximising environmental protection and limiting environmental impact

4.3 Turning to the National Sustainable Placemaking Outcomes (Figure 5) the following are particularly relevant:-

Creating and Sustaining Communities

- Enabling the Welsh Language to thrive
- Appropriate development densities
- Homes and jobs to meet society's needs
- A mix of uses

Growing Our Economy in a Sustainable Manner

- Fosters economic activity
- Vibrant and dynamic
- Adaptive to change

Making Best Use of Resources

- Makes best use of natural resources
- Prevents waste
- Prioritises the use of previously developed land and existing buildings
- Unlocks potential and regenerates
- High quality and built to last

Maximising Environmental Protection and Limiting Environmental Impact

- Resilient biodiversity and ecosystems
- Distinctive and special landscapes

- Integrated green infrastructure
- Reduces environmental risks
- Manages water resources naturally
- Reduces overall pollution
- Resilient to climate change

Facilitating Accessible and Healthy Environments

- Accessible and high quality green space
 - Accessible by means of active travel and public transport
 - Not car dependent
 - Minimises the need to travel
 - Provides equality of access
 - Feels safe and inclusive
 - Supports a diverse population
 - Good connections
 - Convenient access to goods and services
- 4.4 Key objectives and requirements for good design are set out in para's 3.3-3.16 with key themes being inclusivity & accessibility (3.5-3.6), environmental sustainability (3.7-3.8), character & context (3.9-3.10, 3.14), community safety (3.11), movement (3.12-3.13).
- 4.5 Para's 3.15 & 3.16 provide guidance on how to consider issues of design, requiring Authority's to have policies and guidance to promote good design and provide a robust basis for refusal of poor quality design. This work should also take place for strategic issues including plan allocations. When considering design an Authority is required to seek to improve poor or average designs, and to reject them where they are not successful with clearly articulated grounds required in any refusal. However, it is clearly stated that *"they should not attempt to impose a particular architectural taste or style arbitrarily and should avoid inhibiting opportunities for innovative design solutions"*.
- 4.6 Para's 3.25-3.29 identify the importance of the Welsh Language and require LPA's to consider the likely effects of development upon the Welsh Language and include policies within the LDP's assessing impacts.
- 4.7 Specific guidance is set out on placemaking in rural areas in para's 3.38-3.40 with decision makers required to strike an appropriate balance between preserving the attributes of rural localities with the need to meet the economic, social and recreational needs of local communities and visitors (para. 3.38). It is noted that the general priority is to locate new development in more sustainable locations within or around existing settlements (3.39-40, & 3.60) which would be achieved by this scheme.
- 4.8 Section 4.1 provides overarching guidance on issues of relevance to transport, with a key priority being to enable more sustainable travel, utilise existing capacity effectively, and managing demand (in particular by reducing reliance upon the use of private cars).
- 4.9 Para's 4.1.8-4.1.9 set out key objectives and measures to reduce reliance upon the private car and support a shift towards the use of non-car modes of transport, with a clear transport hierarchy set out at figure 8.

- 4.10 Para. 4.1.16 is relevant as it highlights that in rural area's LPA's must take a different approach to sustainable transport to take account of the particular characteristics of a locality and the other objectives which they are seeking to achieve (for example sustaining the rural economy or supporting appropriate growth in populations).
- 4.11 Para's 4.1.50-4.1.54 set out a general approach to car parking, with an emphasis on reducing parking levels wherever possible to take account of the accessibility of sites by other modes.
- 4.12 Section 5.4 sets out overarching guidance on economic development, which is defined as *"the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes"*, with economic uses including traditional employment activities as well as other *"uses such as retail, tourism, and public services"*. However Section 5.4 focuses primarily on those traditional B-Class uses.
- 4.13 Section 5.5 sets out policy on tourism, highlighting the benefits of it to local economies, together with the need to ensure that it also contributes to other planning objectives and requirements (5.5.1-5.5.2).
- 4.14 Section 6.1 sets out broad ranging policy covering all aspects of the historic environment, and the requirement to conserve and enhance it.
- 4.15 Section 6.1.7 identifying the importance that the planning system has on protecting, conserving and enhancing the significant of historic assets. This includes consideration of the setting of the historic asset which might extend beyond its curtilage. Any change that impacts on the historic asset or its setting should be managed in a sensitive and sustainable way.
- 4.16 Section 6.1.8 sets out that it is the responsibility of all those with an interest in the planning system, including planning authorities, applicants, developers and communities to appropriately care for the historic environment in their area. The protection, conservation and enhancement of historic assets is most effective when it is considered at the earliest stage of plan preparation or when designing proposals.
- 4.17 Guidance on addressing sites with designated remains or sites that are not-designated but have the potential to contain features of value is set out 6.1.23-6.1.27, and except where sites are of national importance there is requirement that Authorities balance the importance of the remains and their setting against the requirement for development. In all cases where remains exist or may exist then a sufficient assessment is required, and where they are present then suitable measures must be proposed and secured to investigate and record them, and to deposit the resulting finds/information in an approved repository.
- 4.18 Section 6.3 sets out policy concerning landscapes, noting that all landscapes are valued and that their special characteristics should be protected and enhanced whilst paying *"due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places"*.

- 4.19 Section 6.4 sets out the approach to ensuring that the planning system plays its part in reversing the decline in biodiversity and improving ecosystem resilience by protecting against losses and securing enhancements (6.4.1-6.4.8).
- 4.20 Para's 6.4.10-20 set out guidance on the differing levels of nature conservation designation, ranging from international down to local level non-statutory designations. The key principle is that the relative value of the designation must be assessed, and that the impact of a proposal must be fully considered to ensure that adverse impact are avoided (unless in certain cases the scheme is of sufficient importance and there is no feasible alternative).
- 4.21 Para. 6.4.21 sets out more detail on the approach to maintaining and enhancing biodiversity, with a step-wise approach set out requiring that losses are first avoided where possible, minimized where not, then mitigated, and as a last resort compensation is provided. This includes opportunities for the use of conditions, planning obligations, or advisory notes, or in particular circumstances off-site compensation.
- 4.22 In particular the guidance set out in para's 6.4.22-6.4.23 are of relevance due to the potential value of the site and the features around it to protected species, and as habitat in itself.
- 4.23 As the site is set within influencing distance of trees the guidance in para's 6.4.24-6.4.27 is relevant.
- 4.24 Following the introduction of national mandatory SuDS standards and the SAB process, SuDS requirements are flagged up in para's 6.6.17-6.6.19 as a key issue in any new development, and especially those exceeding the relevant threshold.
- 4.25 Para's 6.6.20-6.6.21 express the requirement to utilise sewers in areas served by them, and where they are not present that suitable detail is provided on alternative systems.

Technical Advice Notes (TANs)

TAN5 - Nature Conservation & Planning - 2009

- 4.26 Again, this TAN is relevant due to and the potential for it to host protected or priority species and/or habitats.

TAN12 - Design - 2016

- 4.27 TAN12 is somewhat relevant as the proposal involves other new development, and so its guidance on good design applies to the scheme.

TAN13 - Tourism - 1997

- 4.28 TAN13 provides guidance on tourism planning in Wales, although in this case it does not provide any specific guidance for this development, except in relation to holiday occupancy conditions designed to control the use of the holiday accommodation, which is a matter for the LPA if it were minded to grant the proposal.

TAN 18 - Transport - 2007

- 4.29 TAN18 is directly relevant to this application as it sets out the direction for transportation strategies that planning authorities should adopt at a policy level.
- 4.30 The guidance in *para's 3.15-3.16* is relevant as it sets out an approach for rural tourism requiring a balance to be struck on accessibility. Indeed, para. 3.15 states “*In rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific area.*”
- 4.31 In particular, the sections on maximum parking standards and the need to consider accessibility of sites set out in *para's 4.6-4.7* are relevant.
- 4.32 *Para's 9.12-9.15* are also relevant as they set out guidance on detail on the use of travel plans and their role in fostering the use of non-car modes of transport.

TAN20 - Planning and the Welsh Language - 2017

- 4.33 This TAN relevant to the proposal as a Community & Linguistic Statement is has been provided. This TAN sets out greater detail on the approach to assessing and addressing impacts upon the Welsh Language though the LDP process and in development control decisions.

TAN23 - Economic Development - 2014

- 4.34 Section 1.1 of this TAN states that economic development includes both the ‘traditional’ economic uses as well as other employment generating uses, which includes tourism and leisure. It emphasises that the planning system must recognise “*the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations*”. However, the TAN focuses primarily on the B-Class uses with some exceptions where additional guidance is required.
- 4.35 Section 3.1 of this SPG again emphasises the importance of economic development in rural areas, and the need for criteria based polices to deal with development that cannot be addressed through allocations in Local Development Plans.

LOCAL PLANNING POLICY

Joint Anglesey & Gwynedd Local Development Plan (JLDP) - (2017)

- 4.36 The *JLDP* is the key material planning consideration for the proposal and sets out a variety of policies which are of relevance to the proposal, which include:-
- 4.37 **Policy PS1: Welsh Language and Culture** - Sets out thresholds beyond which development will trigger the requirement for a Welsh Language Statement, or in the case of more substantial developments a Welsh Language Impact Assessment. It also confirms that where proposals would “*cause significant harm to the character and language balance of a community that cannot be*

avoided or suitably mitigated by appropriate planning mechanisms” that such schemes should be refused.

- 4.38 Policy PS2 & ISA 1: Infrastructure and Developer Contributions & Infrastructure Provision** - Set out requirements that developments must provide or be served by sufficient infrastructure, and that where such infrastructure does not exist or has inadequate capacity then this must be provided either as part of the development or through financial contributions towards new infrastructure in the locality.
- 4.39 Policy PS 4: Sustainable Transport, Development and Accessibility** - This policy sets out the high-level principles for matters relating to transport and accessibility within the plan area and summarises key material issues that are of relevance for this broad material consideration.
- 4.40 Policy TRA 1: Transport network developments** - is of some relevance to the scheme as it set out a requirement for schemes over a certain threshold or in sensitive areas that substantially increase journeys to provide a Transport Assessment.
- 4.41 Policy TRA 2: Parking Standards** - Defines the LPA’s parking standards for all modes of transport (by reference to a relevant SPG).
- 4.42 Policy TRA 4: Managing Transport Impacts** - This policy defines the transport and access hierarchy for proposals to be assessed by and requires that development accounts for this hierarchy and does not cause unacceptable harm.
- 4.43 Policy PS 5: Sustainable Development** - This policy confirms that development will be supported where it is demonstrated that it is consistent with the principles of sustainable development.
- 4.44 Policy PS 6: Alleviating and Adapting to The Effects of Climate Change** - This policy is the companion to PS 5 and requires that development includes specific aspects that will assist in alleviating the effects of climate change.
- 4.45 Policy PCYFF 1: Development Boundaries** - This policy defines the plan’s policy in respect of the approach to development within or outside development boundaries, stating that:- for development within them that this will be allowed subject to compliance with specific policy relevant to the nature of development proposed; or, for development outside boundaries that it will only be allowed where it complies with specific policy within the JLDP or at a national level, or where a countryside location is proved to be essential.
- 4.46 Policy PCYFF 2: Development Criteria** - This policy sets out the key criteria which apply to development proposals across the plan area, detailing things which development should provide and also areas where if unacceptable impacts are identified a development will be refused.
- 4.47 Policy PCYFF 3: Design and Place Shaping** - This is the overarching design policy for the plan and sets out all the key issues which relate to good quality design and development.

- 4.48 Policy PCYFF 4: Design and Landscaping** - This is the overarching design and landscaping policy for the plan and sets out the key issues relating to landscape which relate to good quality design and development.
- 4.49 Policy PCYFF 6: Water Conservation** - This policy defines requirements for efficient usage and best practice of the management of water consumption and drainage of a proposal. It sets out a requirement that a Water Conservation Statement be provided for major development schemes.
- 4.50 Strategic Policy PS 14: The Visitor Economy** - This is a strategic policy that sets out the overall approach to encouraging a year-round tourism economy whilst respecting key spatial considerations.
- 4.51 Policy TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation** - This policy provides the LPA's approach to caravan and chalet sites, setting out a 4 pronged approach dependant on a site's location, but with the most relevant section in this case being that concerning the creation of new sites outside of the AONB's and SLA which are allowed provided that they are in an appropriate location, of a good design, and do not lead to an over-saturation of such sites.
- 4.52 Strategic Policy PS 19: Conserving and where Appropriate Enhancing the Natural Environment** - Sets out high level policy to conserve and where appropriate enhance the natural environment, countryside and coastline of the plan area, and not to allow developments that have significant adverse effects except where the benefits of a development clearly outweigh the harms. The policy also sets out key points which must be given consideration when assessing applications, including impacts upon habitats & species, geology, and landscapes, designated sites, biodiversity, green & blue infrastructure, trees hedgerows & woodlands.
- 4.53 AMG 3: Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character** - Guidance is given in this policy that requires consideration of features and qualities that are distinct to local landscapes, and which requires that where proposals would have a significant adverse impact upon landscape character that this has been considered in designing the development and selecting the site.
- 4.54 Policy AMG 5: Local Biodiversity Conversation** - This policy ensures that biodiversity is identified and protected in all proposals, and that mitigation and/or enhancement is provided as part of new development.
- 4.55 Policy PS 20: Preserving and where appropriate enhancing heritage assets** - This policy sets out the strategic framework for development affecting heritage assets and the objective of ensuring that development should preserve and where appropriate enhance such assets.
- 4.56 Policy AT4: Protection of non-designated archaeological sites and their setting** - Detail is provided in this policy on the Authority's approach to sites of varying trades of archaeological importance, requiring that suitable assessment of such sites is provided and that regard is paid to the value of such sites, and they are only developed if the impact is acceptable. Where such sites are permissible for development the policy requires that conditions are imposed requiring a programme of archaeological work to be undertaken prior to commencement of development.

Supplementary Planning Guidance

4.57 The LPA has also adopted a number of guidance documents which expand upon policy within the LDP and provide greater detail and guidance on the LPA's approach to the key considerations that they cover. However, presently all of these documents relate to the previous development plan, and as such the weight that can be placed upon them is reduced. The following SPG's are *potentially* of relevance for this proposal:-

- Parking Standards (2008);
- Maintaining and Creating Distinctive and Sustainable Communities (2019);
- Design Guide in the Urban and Rural Environment (2008);
- Tourism Facilities and Accommodation (2021).

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5.0 PLANNING CONSIDERATIONS

- 5.1 This section will examine the key material considerations for the proposal and assess the development against them in order to demonstrate that it is an acceptable scheme.

PRINCIPLE OF DEVELOPMENT

- 5.2 The proposal would utilise a contained area of land that is set in a highly accessible location on the edge of Llangefni and close to key transport routes to accommodate a suitable holiday accommodation development for both the site and locality. As such, it is clear that it will make an appropriate use of this site that is generally compliant with the strategy and policy for this type of development as set out in the Anglesey & Gwynedd Joint Local Development Plan (JLDP), which allows for the development of this type on 'suitable' sites under policy TWR 5 subject to certain key considerations being addressed.

- 5.3 As the units would be twin unit static caravan type units **policy TWR 3** is the key policy concerning this proposal and its requirements are examined below, with greater detail on key areas provided in the documents that accompany this statement as part of the planning application, and in the summaries provided in the relevant parts of this section of the PSS.

- 5.4 So in respect of policy TWR 3 it is clear that:-

- 5.5 **Criterion i. - It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality** - It would not lead to a significant intensification of static, chalet, or permanent alternative camping sites in the locality as the nearest site to the proposal is set at over 3km from it, with others set well in excess of that, and with a good degree of visual separation between the proposal and other sites in the wider area. As such the proposal cannot be considered to lead to a 'significant' or indeed any material intensification in such sites in the locality.

- 5.6 **Criterion ii. - That the proposed development is of a 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 the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape** - As set out in detail in this statement and in the supporting documents, the scheme is of a high quality in terms of its design, layout and appearance, and is sited in an unobtrusive location with a good degree of existing landscaping that provides a high standard of screening which would be enhanced as part of the scheme. As a result, it is clear that a great deal of care has been taken to ensure that the scheme will have a minimal impact upon the local landscape and that it will respect and retain its visual qualities.

- 5.7 It should also be noted that the Applicant's intention is to offer a high standard of lodge and visitor experience, with the luxury accommodation market being target for this development. This has allowed them to secure interest and support from Hoseasons, who are key operators in this sector (see submitted letter). It is intended that they will partner with them to market and the site, which will require that the site is of a high quality.

- 5.8 **Criterion iii. - That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features** - The site is close to the main highway network and access can be provided without any harm to the landscape characteristics and features.
- 5.9 As such, it is clear that the proposal complies with relevant policy concerning the principle of this type of development, which includes chapter 3 and **section 5.5 of PPW, as well as policies PS5, PS6, PCYFF1, PCYFF2, PCYFF3, PCYFF4 & TWR3 of the JLDP and the relevant SPG.**

OTHER MATERIAL CONSIDERATIONS

Design & Visual amenity

- 5.10 When assessing **the design of the proposal**, the first step is to assess its context. It is clear that the site is set on a transition point between the urban centre of Llangefni and the surrounding rural landscape (which also features a number of man-made elements). The site itself is quite well contained visually as it is set amongst well established and tall hedgerows & trees which offer screening to its boundaries.
- 5.11 The proposed development has been designed to have a low-lying form in terms of the structures proposed, and also will involve a suitable set of changes to land-form (with the only major change being the excavation of the surface water pond) and a well landscaped and open layout that would give the site a natural and attractive feel. As a result, it is considered that the development proposed would be suited to its setting in a rural area.
- 5.12 Although the precise type of lodges to be used in the scheme have not been specified at this stage, indicative plans of the type and standard of unit to be used have been supplied as part of the submission. These demonstrate that they will have a high quality & attractive design with an appropriate palette of materials, finishes, and design features. This approach would result in the lodges having an attractive appearance which will ensure that they form suitable additions to the site.¹
- 5.13 Similarly, the proposed reception will be of an identical design to the single bedroom lodges, and thus would have an attractive and low-key appearance with suitable cladding proposed that will have a muted colour palette, and a low form and scale proposed. This would provide the required office provision and associated staff facilities to run the site.
- 5.14 The above points are demonstrated by the plans and visualisations provided as part of the application.
- 5.15 Indeed, the visual amenities of the site and its effect upon the **wider landscape** have been a key point in the design of the scheme. Early in the design process the Applicant engaged Land Studio Landscape Architects who have provided extensive input and guidance on the design of the scheme

¹ It is proposed that the approval of the detailed design of the units to be used on the site could be controlled through a suitably worded pre-commencement condition. This would allow the LPA appropriate control over the design and standard of the proposed units whilst also allowing the Applicant a reasonable degree of flexibility in securing a suitable manufacturer. This is a standard approach for schemes of this type that has been adopted by this LPA, and other Authority's nationally.

which has influenced the layout, form, and general design of the proposal. This advice was sought in order to ensure that the proposal would form a suitable and attractive addition to the landscape of the locality that would be appropriate to the site and setting.

- 5.16** *The resulting Landscape & Visual Impact Assessment and accompanying Landscaping scheme detail has been submitted as part of this application.* The LVIA assesses the character of the locality and of the proposal and considers whether the proposal is acceptable in this location. That report should be read in full but it is felt the following points drawn from the conclusions adequately summarise the LVIA for the purposes of this report:-

“Landscape Effects

11.5.1. *The impact to the landscape character overall as a result of the proposed development would be a slight adverse effect on the landscape character of the site and negligible on the local character area. The assessment recognises that the site is not within any landscape designations and effects will be limited to a relatively small and well screened area of the West Central Anglesey NCA and local character areas such as Open Rolling Lowland and Open Lowland Valley.*

11.5.2. *The assessment also recognises that the proposal could offer the opportunity to improve the setting and biodiversity of the local area experienced by receptors using the adjacent road network and nearby local footpaths. Please refer to Section 11 Mitigation for more details.*

11.5.3. *The landscape proposal looks to retain and improve the existing landscape features, specifically the woodland edge and hedgerows which form valuable setting and screening along the B5420 and the New Link Road to the south and west of the site.*

12. Visual Effects

12.1.1. *The impact to the visual amenity of the area as a result of the proposed development overall is Negligible. The main impact to views is extremely limited and includes views from the distant residential properties along the unclassified road to the north and glimpse views for users of local public footpaths during winter months.*

12.1.2. *The site benefits from significant hedgerow and tree planting along its boundaries, which if maintained and supplemented as detailed in Land Studio’s Landscape Proposal will provide screening and retain the scenic quality along the B4520 corridor.*

12.1.3. *The sensitive location of the reception building concealed within the south western corner of the site, in conjunction with its woodland backdrop will screen the majority of views. Although other areas of the site may still be visible from some aspects, this will eventually be further mitigated with the establishment of the native tree and hedgerow planting, helping to minimise its overall scale.*

12.1.4. *This assessment concludes that the combined proposals would have an overall Negligible effect on landscape and visual receptors, it recognises that through the proposed landscape design, beneficial*

effects can be achieved which can offset the minimal impacts of the proposed development on the existing site.”

- 5.17 The proposal also includes detail of a proposed **landscaping scheme** for the development that will assist in accommodating the development in its context, and in particular addressing the very modest impacts identified in the LVIA. The overall result being to ensure that it respects its setting and that views into the site are well screened.
- 5.18 Overall, it is clear that the proposal responds well to its context and would ‘sit well’ within it, in terms of the development’s scale, form, character, and appearance, and the scheme’s setting in a well landscaped site. As a result, the proposal will comply with **section 6.3 and para’s 6.3.5-6.3.10 of PPW, and TAN12, and policies PCYFF2, PCYFF3, PCYFF4, TWR3, PS19, and AMG3**, as it will successfully integrate into its setting within the landscape, both due to the well-screened nature of the setting and low-key nature of the proposal, and the steps taken to retain existing boundary features and supplement those with new planting, with the result that it will respect the landscape within which it is set and will form an unobtrusive addition to it.
- 5.19 The landscape assessment and design approach has been informed by the advice given in the response to the pre-application enquiry, and it is considered that the scheme addresses the points raised by the Authority’s Landscape Advisor.
- 5.20 Turning to the question of **energy use and built sustainability** it is intended that the proposed lodges would be designed to reduce their energy consumption through high levels of insulation, and the specification of energy efficient technology and fittings, as well as appliances and fittings that would reduce the use of water. As such environmental impacts of the proposal will be minimised.
- 5.21 This will address the requirements of **para’s 3.7-3.8 & section 5.8 of PPW, TAN12, and policies PS5, PS6, PCYFF3, & PCYFF5 of the JLDP.**

Economic impact

- 5.22 The proposed lodges would provide high quality accommodation that would cater for the growing market for this type of facility among tourists visiting the area who now often seek higher quality accommodation on well-designed lower density sites such as that proposed here. The site would be well-placed to attract the particular market that this type of site serves as it will offer an attractive and ‘rural’ location which would also be set within easy reach of a main town as well as the strategic transport network and the attractions available in the area. As such it would be a particularly valuable addition to the local tourism sector, and to the wider local economy.
- 5.23 The proposal will also create considerable economic benefits for the wider local economy from the substantial contribution made by visitor spending in the area. Indeed, based upon assumptions listed in the following table:-

Table 1 - Estimated average economic impact of proposal

AVERAGE Economic Impact Calculation - Dafarn Newydd, Llangefni

| Accommodation | Number of units (N) | Average number of visitors per unit (AV) | Days per unit in season (D) | Average occupancy level (AO) | days per unit p/a (YDU) (where D=[AVXQ] AO) | Total visit days for each unit type (YDPU) (where YDPU=YDU x N) |
|---------------------------|-----------------------------|--|-----------------------------|------------------------------|---|---|
| Standard lodge | 34.00 | 3.00 | 365.00 | 60.00% | 657.00 | 22338.00 |
| <i>No. months = 12.00</i> | | | | | | |
| Totals | 34.00 | 102.00 | 365.00 | | | 22338.00 |
| | Total Units for Site | Total (Average) Visitors for site | Total Days for site | | | |

Total Visitor Days for all of the units on the site (TYD)
22338.00

Total input from the site into local economy based on assumed spend per person/visitor per day (shown in key values table below) (LEI) (where LEI=TYD x PPVPD)
£982,872.00

Which is equivalent to supporting **56.16** jobs @ £17,500.00
 Which is equivalent to supporting **49.14** jobs @ £20,000.00

| Key Values | |
|--|-------------|
| Amount spent in the local economy p/person p/day (PPVPD) | £ 44.00 |
| Days per month multiplier | 30.41666667 |
| Job assumption lowest income amount | £ 17,500.00 |
| Job assumption highest income amount | £ 20,000.00 |

5.24 The site would contribute a minimum of **£982,872** from visitor spend. The economic impact of this spend would be to **equivalent to supporting between 49.1 and 56.1 jobs**. This would be a substantial boost for local businesses, and especially so after the devastating impact of Covid-19. It would also be particularly valuable for Llangefni as it is a settlement on the Island that does not benefit from tourism spending to the same extent as the coastal areas, and as such spending by visitors within the town centre will be particularly valuable for the businesses located there.

5.25 The proposal would also support employment directly through employment of people and businesses at the site with **2 persons** expected to be employed on a full-time basis and a further 4-6 on a part-time basis at the site in administrative and customer service roles. In addition, further jobs will also be supported and provided through other roles such as cleaning, site and building maintenance, and other such contracted work.

5.26 Overall, the proposal would be a substantial direct benefit to the local economy, and would produce a further boost through the multiplier effect i.e. increased spend in local businesses from visitors and the business, which would generate additional employment, with those employed then spending in local businesses, and so on. This virtuous circle would result from the employment and money circulating in the local economy from the development. As such it would comply with the objectives set out in *Chapter 5 and in particular section 5.5 of PPW as well as strategic objectives in the JLDP.*

Residential amenity

5.27 The submitted scheme would not impact upon the **amenities enjoyed by the occupiers of ‘neighbouring’ properties** as the proposal is set at a considerable distance from the nearest properties in third party ownership, and as a result would not result in any material impact upon their occupiers.

- 5.28 Similarly, the proposal has been suitably laid out to ensure that each of the cabins will enjoy a good level of privacy & amenity for their own occupiers. A suitable level of **amenity space** will be provided for each of the proposed lodges to meet their occupants' needs.
- 5.29 In respect of the broader issue of **activity on the site**, the proposal would not result in a level of activity that would be materially harmful to local residents as a result of disturbance. Indeed, it must be noted that the site is set at a considerable distance from the nearest properties. As such the scheme would be an appropriate development in this context. And would meet the requirements of **chapter 3 of PPW, and policies PCYFF2 & PCYFF3 of the JLDP** as it will not result in materially harmful impacts upon residential or general amenity due to its careful design and siting.
- 5.30 Any **construction impact** from the proposal will be modest and limited in duration, and the site provides adequate space to manage construction impacts entirely within its boundaries. However, if concerns do arise in this respect, then it is submitted that a proportionate approach would be to require a Construction Method Statement through a pre-commencement condition to address construction impacts and management of traffic. Model condition no. 35 of WGC 016/2014 would be ideal for that purpose.
- 5.31 Similarly, controls on construction operating hours would be appropriate in this case and it is submitted that model condition 65 of the same circular should be used and that 08:00-18:00 Monday to Friday, 09:00-17:00 on Saturdays, and 09:00-13:00 on Sundays would be appropriate hours for this site (especially so bearing in mind the recent letter to CPO's advising that longer construction hours should be allowed during the current crisis). If there are concerns in respect of disturbance to local residents then it is submitted that controls could be put in place to limit 'noisy' construction activity to a more limited set of hours.

Highways & accessibility

- 5.32 In respect of **vehicular access**, the proposed development will be served by an existing access from the site onto Lon Penmynydd/Penmynydd Road, which will be improved to serve the proposal. This road provides direct access into Llangefni and onto the wider strategic road network for the Island.
- 5.33 As per the detail set out earlier in this report, SCP were engaged to prepare a Transport Statement for the proposal. The report provides a comprehensive assessment of the proposal as it examines:- the locality and the proposal from a highway safety perspective, parking & access arrangements, the accessibility of the site via non-car modes of transport, and the volume traffic that would be generated by the proposal & its impact upon the highway serving it.
- 5.34 The report has been submitted as part of the application and should be read in full, but it is considered that the following summary is helpful in providing an overview of the site and proposal, and the key conclusions in the Transport Statement:-
1. **Existing conditions** - Section 3 of the report provides detail of the existing conditions at and around the site, noting the its location off Penmynydd Road and close to the centre of Llangefni (at only 1.5km

from the town centre). Details of a speed survey are also shared, which shows that 85th percentile speeds are 49.7mph in a westbound direction, and 50.1mph eastbound. There are also no accidents within the last 5 years in the proximity of the site;

2. **Proposed development** - The report then moves to assess the proposed development in section 4. It notes the improvements that will be made to the access onto the highway, which will provide an entrance that will serve general guest vehicular traffic and will also have an overrun area that will serve HGVs when delivering the lodges (on an infrequent basis). The swept path drawing included within the submission demonstrates that the entrance arrangements will be suitable and useable for articulated HGVs when delivering units. Detail of visibility splays is also provided which are shown to be suitable for vehicles speeds on the Penmynydd Road;
3. The report also notes that a new 2.5m wide shared cycle and pedestrian route (with a small pinch point on its length) will be provided from the western side of the access to tie into the existing infrastructure on the link road. This will provide a good link into the existing network within the town;
4. The internal arrangements are also examined and shown to be suitable to serve both guest traffic and also provide suitable access to a communal refuse collection point within the site. Parking is also examined and shown to be suitable with 2-spaces to be provided per unit, along with visitor parking opposite the reception facility, which would be suitable to serve the proposal;
5. **Accessibility** - The report then moves on (in section 5) to assess the accessibility of the site via non-car modes of transport. The report shows that there are numerous facilities available within a 1-mile walking distance in Llangefni town centre (which would be entirely sufficient to meet all visitors' day-to-day needs) with the pedestrian network between the site and town centre being of a good standard. There are also other facilities just outside of 1 mile distance which are perfectly accessible from the site, and indeed nearby villages are within a reasonable walking distance for a holiday maker;
6. Numerous villages are set within a 5-mile cycle distance, including Llanfair PG and its railway station, along with a 3 national cycle routes allowing easy access onto longer range routes through the area. Turning to public transport, the town is well served by bus routes allowing easy access to key local settlements across the Island and to Bangor, and also to the railway stations in Bangor and Llanfair PG which allow access to wider region and nation as a whole;
7. As such it is clear that the site is very well served by non-car modes of transport and so is well placed to accommodate the development;
8. **Trip generation** - The level of trips generated by the proposal are assessed in section 6 of the report. This shows that the proposal would generate up to 6-way trips during the weekday peak hours, and up to 8 two-way trips in the busiest weekend hour, which equates 1

additional vehicle every c. 8 minutes during peak hours. This is well within the capacity of the highway.

- 5.35 As a result, the report concludes that the proposal is entirely satisfactory and there should be no barrier to its approval on transport grounds.
- 5.36 The proposal therefore complies with the objectives set out in *para's 3.6, 3.12-3.13, and section 4.1 of PPW, as well as in TAN18, and in policies PS/4, TRA1, TRA4, PS5, PCYFF3 of the JLDP.*
- 5.37 The report also entirely addresses the points raised by the Highway Authority in their pre-application response (as provided in the pre-app. enquiry response letter).
- 5.38 Finally, in respect of *access by persons with disabilities or mobility impairments* the proposal has been laid out to provide suitable clear access routes within the site to allow for movement within it by all potential users. Turning to the lodges & reception building these will be single level structures that will be designed and laid out to be reasonably accessible and adaptable, with all accommodation provided at a single level and with the majority if not all of the cabins to have a ramped/step free entrance.
- 5.39 As such, the proposal complies with the requirements of *Chapter 3 and section 4.1 of PPW and TAN18, and policies PS4, TRA2, TRA4, PCYFF2, PCYFF3, & PCYFF4 of JLDP together with the SPG on parking standards.*

Biodiversity & ecology

- 5.40 The Applicant has also sought advice from Ecological Consultants, Cambrian Ecology, who have provided input into the layout and design of the proposal with a view to retaining features of value where present and to provide mitigation features where required. A Preliminary Ecological Assessment of the entire landholding has been produced and has been submitted with the application.
- 5.41 The report should be read in full, but it is considered that the following key points provide an overview of the report and its conclusions:-
1. ***Protected & priority species*** - The site was surveyed for protected species with none found. There is potential for nesting birds to be present within the site, as well hedgehogs, and the hedgerows have potential value as flight paths for bats with the mature trees providing possible bat roosts. The report therefore recommends a mitigation strategy to ensure that bats are not harmed during construction, and that any lighting scheme is suitably controlled. Similarly, measures are set out to avoid impacts upon hedgehogs and nesting birds during construction;
 2. ***Habitat on site*** - The site is primarily comprised of improved grassland with some marshy grassland and scrub in places, with mature trees and hedgerows in place around the site. It also abuts watercourses, with these having minimal aquatic vegetation due to grazing pressure. The hedgerows and trees/woodland that abut the site are of key value in this case. The loss of improved grassland is not considered to be of concern, and the hedgerows and trees/wooded areas adjacent to the site will be retained (see later in this section for detail of the approach

to trees). Precautionary measures are also required to ensure that watercourses do not provide a transmission vector for a siltation or pollution incident during construction;

3. **Designated habitats & records of species within area** - The site is set within 1km of two wildlife sites and a restored ancient woodland nearby. No direct impacts upon these are predicted;
4. **Mitigation and enhancement** - Mitigation and enhancement for loss of grassland within the site would be provided as part of the scheme through the new planting proposed as part of the landscaping arrangements. The existing hedgerows, watercourses, and woodland within the site will also be managed as per the recommendations to allow their value to increase. The possible impacts from the minimal amount of tree and hedgerow removal required as part of the scheme can also be addressed through survey work and timing of activity to avoid impacts. Precautionary steps will also be required to avoid any possible impacts upon watercourses during construction;

5.42 It is submitted that the report demonstrates that the development of the site is acceptable due to its very limited value, and indeed that improvements can be achieved from the site's current condition. The proposed mitigation & enhancement measures are achievable and included in the design of the proposal, and could be secured by way of a suitable suite of conditions upon any permission. As such the proposal complies with the guidance set out in **section 6.4 of PPW and TAN5, and with policies PCYFF2, PCYFF3, PCYFF4, PS19, & AMG5 of the JLDP.**

5.43 Again, the proposal responds to the advice given by the Authority's Ecological Advisor in the pre-application enquiry, which was generally favourable, with the recommendations of the ecological report carried through into the landscape design of the scheme.

Trees

5.44 The proposal will involve the removal of some trees in order to accommodate the development. A detailed Arboricultural Impact Assessment and Method Statement has been submitted as part of the application, and must be read in full in order to appreciate the detailed arguments on this issue, but a brief summary is presented below:-

1. There are no known TPOs on the site;
2. The proposal is for the removal of groups G5-G6 (which are both of Grade C, and so not of sufficient quality to form a barrier to development), and of selective pruning of parts of G4 to achieve visibility splay sight lines. In addition, small areas of G2 and G3 would be removed to provide accesses onto adjoining land (with this being a minor loss of the much larger groups which would be compensated for through new planting, and which is necessary to retain access onto adjoining land which is currently accessed through this site). A pedestrian path would also be built within the RPA of tree T1, but this can be accommodated through sensitive ground works, retention of ground levels, and use of a geoweb type porous path in the relevant area. Trees T16 and T22 are also shown for removal, but this is

required regardless of development due to their poor condition. The remaining trees (which comprise the overwhelming majority of those on the site) will be retained;

3. To compensate for the loss of trees the report recommends that new trees and landscaping within the site will provide suitable compensation. As per the report this has been provided on the proposed landscaping plans and supporting documents. If this application is approved, then the replacement planting would also of course be subject of a condition requiring that it is managed whilst establishing and that it not be removed thereafter;
4. There would be some potential for harm to the retained trees during construction if the development is not well managed, and so protection measure are specified in the report and on the proposed drawing, including barriers, hand digging and other measures within protected areas, and use of Cellweb Root Protection system (or equivalent) for the (minimal) hard surfaced areas within RPAs. The report recommends that these matters are best conditioned, with the report providing a detailed AMS and TPP which allows for full consideration of the expected approach. If this application is approved then this report could either be conditioned to be followed, or if required a final AMS & TPP could then be produced and then considered & approved prior to any work commencing on the development, with this controlled through condition.

- 5.45 As such it is submitted that although the proposal will result in the loss of a small amount of trees that there is in fact a sound justification for their removal and replacement with compensatory planting as their quality is not sufficiently high to present a barrier in principle, the vast majority of trees on site will be retained, and there will be other planning benefits arising from the development. As such there is a clear justification for the proposal, and therefore it is submitted that the proposal complies with the policy set out in *para's 6.4.24-27 of PPW and also with TAN10*, and with policies *PCYFF4, PS19, & AMG/3 of the JLDP*.

Welsh Language

- 5.46 Policy PS1 and its accompanying SPG set out where with a Welsh Language Statement or Impact Assessment is required. In this instance the requirement is for a CLS as the proposal is for a commercial development of over 1000m² of floor area, but it is not of the scale where it meets the trigger for a CLIA/WLIA as it will not result in the scale of employment required to trigger such an assessment, nor will it need to draw from persons outside the 'travel to work area' around the site.
- 5.47 That document should be read in full as it gives a full assessment of the scheme. However, it is clear that the scheme will have a modest impact and is likely to be beneficial in providing employment opportunities that can be met by the local population, thus increasing the self-containment of the local economy and assisting in retaining the population. In addition, there will be benefits for local services, facilities, and other employers through the spending created by the site and visitors, which will help to support their offer to local residents which is vital to maintaining a vital and viable community. There is some risk around possibly attracting non-Welsh speakers

to work at the site, and from non-Welsh speaking visitors being present in the community, but these can be mitigated, with an overall low risk.

5.48 As the scheme will have minimal potential risks only modest mitigation is required. This would include:-

1. **A Welsh language signage scheme** - Easily conditioned as part of any approval, which must include Welsh alongside English with Welsh given priority/higher positioning on signage.
2. **Use of a Welsh Language Name for the development** - To retain the visibility of the Welsh Language.
3. **A Welsh Language Policy/Plan for the site** - Such a document has not been produced at this stage as this is premature, however this can be conditioned as part of any approval. This should include targets and requirements to hire Welsh Language speakers, to give the language an equal status in the workplace, and to promote the use of Welsh within the business and to visitors.
4. **Marketing and visitor material must highlight Welsh Language and Culture** - All marketing and visitor information will highlight the history and heritage of the area, and indeed it intended that this will be a key 'feature' of the site that will assist in attracting visitors. This material will assist in raising awareness of visitors to the site of the local historic and cultural characteristics of the area, including the Welsh language, and so will assist in improving awareness and sensitivity of the culture and language of the area to visitors. This would be a beneficial impact from the proposal
5. **All literature provided will be bilingual.**

5.49 The above limited set of measures would be sufficient to mitigate the risks/impacts identified and ensure that the scheme results only in positive impacts for the Welsh Language and its use in this community. These measures are easily imposed through a suitable suite of conditions upon any planning permission.

5.50 As such the proposal will comply with the **objectives of para's 3.25-3.29 of PPW, and within policy PCYFF2 of the JLDP**, as the scheme will result in benefits for the local community through employment and support of local services, and the modest possible impacts identified can be mitigated through the proposed measures.

Drainage & surface water

5.51 A Drainage Report, technical information, & plans prepared by Weetwood's have been provided as part of the submission. These set out the drainage approach for the scheme, and detail the results of porosity tests on the site. The documents should be read in full but in brief they demonstrate that:-

- **Foul drainage** - A new connection is proposed to the DCWW sewer set to the west of the site on Penmynydd Road, with a pumping station proposed on the site;
- **Surface water drainage** - Investigations have been undertaken on the site to assess the potential for disposal of surface water to

soakaways or other SUDS compliant solutions on the site, and these have concluded that the site conditions do not allow use of soakaways but that the proposal can be drained to the existing watercourse on the site's eastern boundary through use of an attenuation basin set on the boundary and flow control, which will moderate flow from the scheme to acceptable levels. Modelling data also shows that the system will be sufficiently robust to accommodate expected storm events and climate change impacts. As such it is clear that a suitable surface water drainage system has been proposed to serve the proposal. It is intended that a SuDS pre-app. will be submitted at the appropriate stage of consideration of the proposal.

- 5.52 The proposal therefore complies with the requirements of *para's 6.6.1-6.6.21 of PPW, and polices PCYFF2 & PCYFF6* as suitable drainage arrangements have been proposed for both foul and surface water drainage which comply with the preferred drainage approaches for both.

Archaeology

- 5.53 During pre-application discussions, the potential for the site to have archaeological value was raised. As a result, the Applicant commissioned Nexus to undertake a detailed assessment of their whole landholding. The resulting report detailing the desk-based assessment, walkover survey, and geophysical survey results are provided alongside this report as part of the submission, and provide a detailed account of the work undertaken on the site. As such, it must be read in full, but the conclusions section of the report is provided here as it is felt that it provides a useful summary of the extensive and detailed information contained within the report:-

There are no registered World Heritage Sites (or WHS Buffer Zones), Scheduled Ancient Monuments, wholly or partly within in the Site. Therefore, this Assessment confirms that the Site does not contain any designated archaeological assets for which there would be a presumption in favour of preservation in situ and against development.

Prior to the commission of this assessment there were no known undesignated archaeological assets within the Site but the assessment has identified a number of potential archaeological remains at the Site which may contain reservoirs of information on previous human activity in the area.

This Assessment enables an informed, sustainable and responsible approach to development of land at the Site. The information provided meets the expectations of national policy in that the Site could reasonably be expected to have a potential for archaeological remains and the applicant has arranged for the preparation of a desk-based assessment and field evaluation by means of geophysical survey. These permit an understanding of the impact of the proposed development on the significance of those remains.

The Site is contains archaeological remains which are not nationally important and so the issue revolves around less significant archaeological remains, and the planning authority will need to weigh the relative importance of the archaeological remains against other factors,

including the need for the proposed development. There is no indication that the Site has been identified in any development plans as of local importance for heritage reasons and containing heritage assets worthy of conservation.

It is concluded that there are no axiomatic reasons arising from archaeological considerations to refuse planning permission. Less significant archaeological assets may be harmed/lost as a consequence of the proposed development. However, the Council is not obliged to refuse consent in the light of such harms. Rather it must make a balanced judgement with respect to such less significant archaeological assets.

The relevant guidance in these matters (Chartered Institute for Archaeologists 2014) notes that while recommendations on further archaeological work may be justified, in most circumstances within the planning framework the provision or recommendations to the Local Planning Authority will be the responsibility of the relevant planning archaeologist. This document does not wish to prejudge the opinion of the Senior Planning Archaeologist of the Gwynedd Archaeological Planning Service, but it is considered appropriate and helpful to offer options for further assessment and the possibilities for reducing or mitigating harm, should planning permission be granted.

With respect to further assessment there is no justification for any further assessment of the extant landscape features. However, it would be within policy provision for the local planning authority to expect a sample of the geophysical anomalies to be investigated prior to impact in order to confirm the presence/absence of archaeological features and examine the nature of any archaeological remains. Such an investigation could be undertaken prior to determination of the planning application or be mandated as a condition of consent, should any planning permission for the Site be forthcoming.

The local planning authority may also wish to ensure that any impacts to extant landscape features and/or archaeological remains are mitigated. In the first instance it would expect the applicant or the successors in title to endeavour to design a scheme which would preserve in situ as much of the heritage resource as possible. Where such preservation would be incompatible with the consented development it would be reasonable for the local planning authority to require the applicant or the successors in title to arrange for a programme of recording and reporting of the heritage resource on the Site prior to any irreversible impact to that resource. The data in this document represents an adequate record of the extant landscape features and a reasonable suite of archaeological attendances could be arranged should archaeological remains worthy of recording be found to exist on the Site.

The application of the mitigation measures would, where warranted by the local planning authority, reduce the significance of adverse effect. The residual effect of the proposed development on archaeological significance, would be within acceptable tolerances as a measures would be adopted to record and advance understanding of the significance of any archaeological asset affected in a manner proportionate to its importance and to make the evidence and archive publicly accessible. The record and understanding if the significance of the archaeological

asset assuages harm and reduces the consequence and degree of that harm.”

- 5.54** As such, it is clear that the potential for archaeological value at the site has been fully assessed and that there is satisfactory evidence that no harmful impact will occur as a result of the scheme if it is allowed, subject to a possible further assessment of buried remains within the site. It is submitted that this requirement could be imposed by condition upon any permission. In any case the application complies with *para’s 6.1.23-27 of PPW, TAN24, and PS20 & AT4 of the JLDP* as there is sufficient information to assess the potential impact upon features of value.

CONCLUSION

- 5.55** Overall, the proposal will make good use of an area of land that is well-contained and which is set in a suitable and highly accessible location adjacent to Llangefni to accommodate a high quality and attractive lodge development that would be suited to its setting and the wider locality in terms of its scale, form, and design. The proposal would have an acceptable and minimal impact upon the landscape, with a detailed landscaping scheme proposed that would address any residual impacts.
- 5.56** The proposal would also have an acceptable impact upon the environment, and would make a valuable contribution to the local economy both through visitor spend and through direct employment. It will also have an acceptable impact upon residential and general amenities, the operation and safety of the highway, and all other acknowledged interests.

-

Review only not for submission

6.0 CONCLUSIONS

6.1 The following conclusions can be drawn from the sections above:-

- The site is well contained visually and the proposed development has been designed to have a low-lying form in terms of the structures proposed. The scheme will have a well landscaped layout that would give the site a natural and attractive feel. The proposed units will also have an attractive design and will utilise high quality materials. As a result, it is considered that the development proposed is suited to its setting in a rural area;
- It is clear from the Landscape Assessment submitted with the application that the development would have a negligible visual impact due to the limited views that exists of the site due to the existing boundary planting. This would be supplemented by the proposed landscaping scheme which will entirely address any residual impacts, and also ensure that the site has a pleasant character and visual quality;
- The proposed lodges would provide high quality accommodation that would cater for the growing market for this type of facility, and would also assist in broadening the range of high-quality self-catered accommodation in the locality. Importantly the site is also well placed in terms of its setting on the edge of a key local settlement, and easy access to the strategic transport network allowing easy and direct access to the wider area;
- The proposal will also create considerable economic benefits for the wider local economy from the substantial contribution made by visitor spending in the area. Indeed, it is estimated that the site would contribute a minimum of **£982,872 from visitor spend**. The economic impact of this spend would be the **equivalent to supporting between 49.1 and 56.1 jobs**. In addition, the proposal would **directly employ people with 2 persons expected to be employed on a full-time basis and 4-6 part-time**, and further employment will also be supported and provided through other contracted work in maintaining the site;
- The submitted scheme would not impact upon the amenities enjoyed by the occupiers of 'neighbouring' properties as the proposal is set at a considerable distance from the nearest properties. As a result, it would not result in any material impact upon their occupiers. It will also provide a good standard of amenity for the occupiers of the proposed units;
- It is clear from the Transport Statement that the access arrangements and highway serving the site are suited to accommodating the proposal, and that suitable parking has been proposed within the site;
- The site is also set within walking distance of the centre of Llangefni and within cycling distance of a number of settlements, with regular bus services available within a short walking distance and rail stations set within easy reach. The site is also well positioned for access to the National Cycle Route. As such it is highly accessible via non-car modes of transport;

- The ecology report submitted with the application demonstrates that the development of the site is acceptable, and indeed that improvements can be achieved from the site's current condition. The proposed mitigation & enhancement measures are achievable and could be secured by way of a suitable suite of conditions upon any permission;
 - The proposal will retain the overriding majority of trees and hedgerows in place around the site, with only very modest removals proposed which would be fully compensated for through the new planting proposed as part of the scheme;
 - The site can be satisfactorily drained, with suitable foul and surface water drainage arrangements proposed as part of the scheme;
 - The proposal will have a neutral to mildly beneficial impact upon the use of the Welsh Language and the linguistic & social character of the locality, and the potential risks to the language can be mitigated through the measures proposed;
 - The proposal is entirely acceptable in all other respects.
- 6.2 In conclusion, the proposal would make use of a highly accessible site set on the edge of Llangefni to accommodate a high quality and low-impact lodge development that would provide a high standard of accommodation and site facilities to visitors whilst having a very limited and entirely acceptable impact upon the landscape of the locality. Similarly, it would have an acceptable impact upon the environment, and nature conservation & biodiversity interests.
- 6.3 The proposal would also make a substantial and valuable contribution to the local economy both through visitor spend and direct employment, which will assist in supporting local facilities and services.
- 6.4 The site is also fully accessible via non-car modes of transport as it is set within easy reach of the facilities within Llangefni, and is highly accessible on bike or via public transport. As such it is clearly a sustainable site and will not be car dependant.
- 6.5 It will also have minimal impact upon residential and general amenities, the operation and safety of the highway, and all other acknowledged interests.
- 6.6 As a result, the proposal fully complies with National and Local planning policy, and indeed it is argued that this standard and type of proposal is precisely the type of development that planning policy seeks to allow. Therefore, it is submitted that there should be no barrier to the approval of the application.

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