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# Planning Statement

## Llandegla Forest Holiday Lodges

On behalf of Oneplanet Adventure Ltd

August 2022

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## 1.0 Introduction

- 1.1 This Planning Statement has been prepared by Pea Green Ltd in support of an outline application for the construction of sustainable holiday accommodation to supplement the existing OnePlanet Adventure mountain biking centre at Llandegla Forest.
- 1.2 Oneplanet Adventure operate the UK's leading Forest Visitor Centre. Located in Coed Llandegla, in the Clywdian Hills and Dee Valley Area of Outstanding Natural Beauty, it attracts 160,000 visitors a year to use its mountain biking, running and walking trails. Opened in 2006 the Centre now provides a cafe, bike shop with hire, workshop facilities and parking for about 300 cars. The facility currently employs ten full time staff and sixteen part time staff.
- 1.3 The proposed development will provide all year round overnight self-contained visitor accommodation in up to 14 prefabricated single storey timber lodges for users of the Centre. The objective is to increase the amount of time that each visitor spends in the local area, rather than attracting additional visitors, to ensure the long-term viability of the facility. This objective accords with Denbighshire County Council's desired outcomes as set out in their Tourism Strategy 2019 -2022.
- 1.4 A separate full planning application is also submitted for a PV installation on the roof of the visitor's centre. This 23kWp array would provide energy for the existing hub building (and notably its kitchens), as well as the proposed lodges and electric vehicle charging points.
- 1.5 The draft proposals have been subject to a pre-application enquiry to Denbighshire Council. Their response provides details on the information required to support any planning application and the planning policy context, but concludes that:

*“In principle, therefore, it is considered that a form of accommodation connected to the mountain bike centre could be acceptable in this location subject to there being significant need demonstrated and that it is appropriate to its setting/capacity within the local environment and infrastructure. The submissions supporting documents confirm that there are no other suitable buildings that could be converted.”*

- 1.6 This planning statement sets out the justification for the proposed development and demonstrates how it complies with local and national planning policy.

## The Planning Application

1.7 The description of the proposed development is as follows:

*An outline planning application, with all matters reserved except means of access, proposing up to 14 holiday lodges with associated car parking and landscaping.*

1.8 The planning application is supported by a series of plans and reports, as summarised in Table 1.1 below.

**Table 1.1: Planning Application Submission Plans and Drawings**

Plan / Report Title	Reference	Organisation
<b>Plans</b>		
Site Location Plan	0002-MS-XX-XX-DR-L-0001 Rev P04	Make Space
Parameters Plan	0002-MS-XX-XX-DR-L-0003 Rev P04	Make Space
Landscape General Arrangements	0002-MS-XX-XX-DR-L-0002 Rev P04	Make Space
Proposed Means of Access	2380-CIV-XX-XX-D-H-40001 Rev P01	Civic Engineers
Topographical Survey	8529/01	Powers and Tiltman
<b>Reports</b>		
Planning Statement	117-001-PS	Pea Green
Design and Access Statement	MS-0002-ID-002-01	Make Space
Transport Statement	2380-01	Civic Engineers
Drainage Strategy	14648-Drainage Strategy-01	Waterco
Habitats Regulations Assessment	14648-HRA-01	Waterco
Preliminary Ecological Appraisal	C483/ 1.0/ Draft	Marches Ecology
Landscape and Visual Impact Assessment Technical Note	2972-ID-002-03	Planit-ie
Arboricultural Impact Assessment	10179 Arboricultural Impact Assessment29.07.22-V2-SB	Amenity Tree
Tree Survey and Constraints Report	Tree Constraints Report-Llandegla Forest -04.05.2022-V1	Amenity Tree
Business Strategy		Oneplanet Adventure



## **Environmental Impact Assessment**

- 1.9 In accordance with the EIA Regulations<sup>1</sup> the application has been subject to a screening exercise for EIA, the results of which are presented at Appendix A. This confirms that EIA is not required for the proposed development.

## **Pre-Application Consultation**

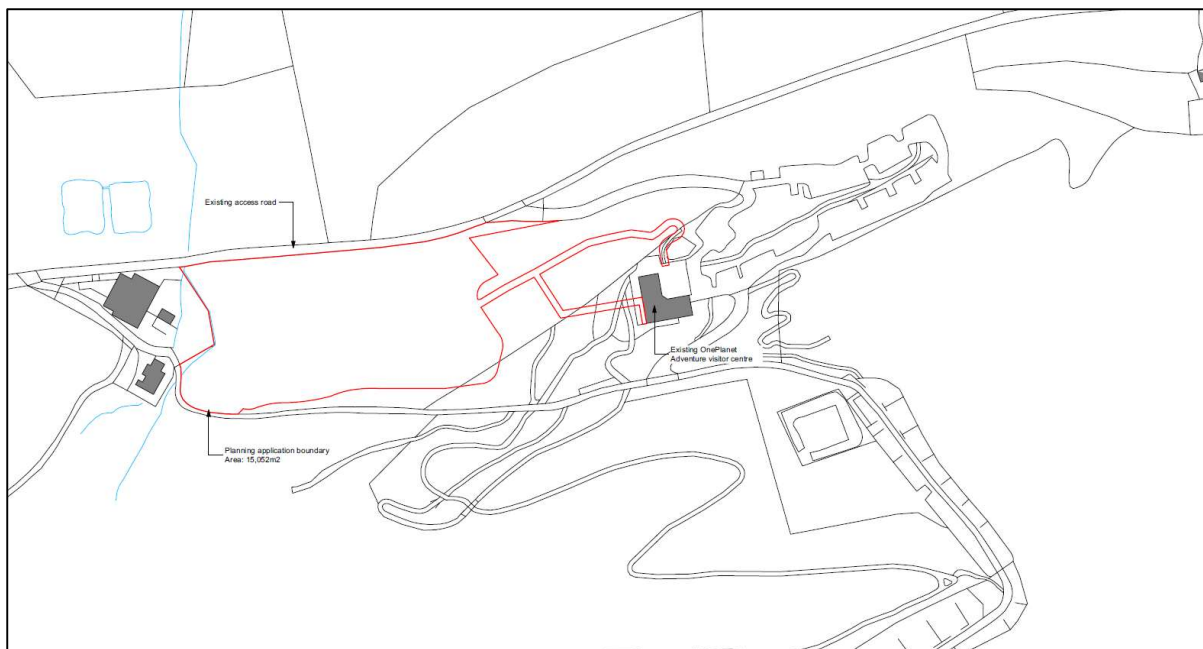
- 1.10 The applicant submitted a pre-application enquiry report for an earlier version of the proposed development in February 2022. This report set out the draft proposals and project objectives and is presented at Appendix B.
- 1.11 Denbighshire Council provided a response to the enquiry on 24<sup>th</sup> March 2022. This response, which is included at Appendix C, provided guidance on the policy framework and initial feedback on the proposals from Council officers. The advice and guidance received has been used to inform the final design of the proposed development.
- 1.12 Members of the technical and design team have conducted pre-application consultation with their counterparts at the Council and statutory bodies. This includes the Council planning, highways and ecology officers, the sustainable drainage systems approval body (SAB) and Natural Resources Wales (NRW). Advice received from these organisations has directly informed the survey and assessment methods and the development proposals. Consultation records are presented or summarised in the submitted technical reports.

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<sup>1</sup> The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, SI No. 567 (W. 136)

## 2.0 The Site

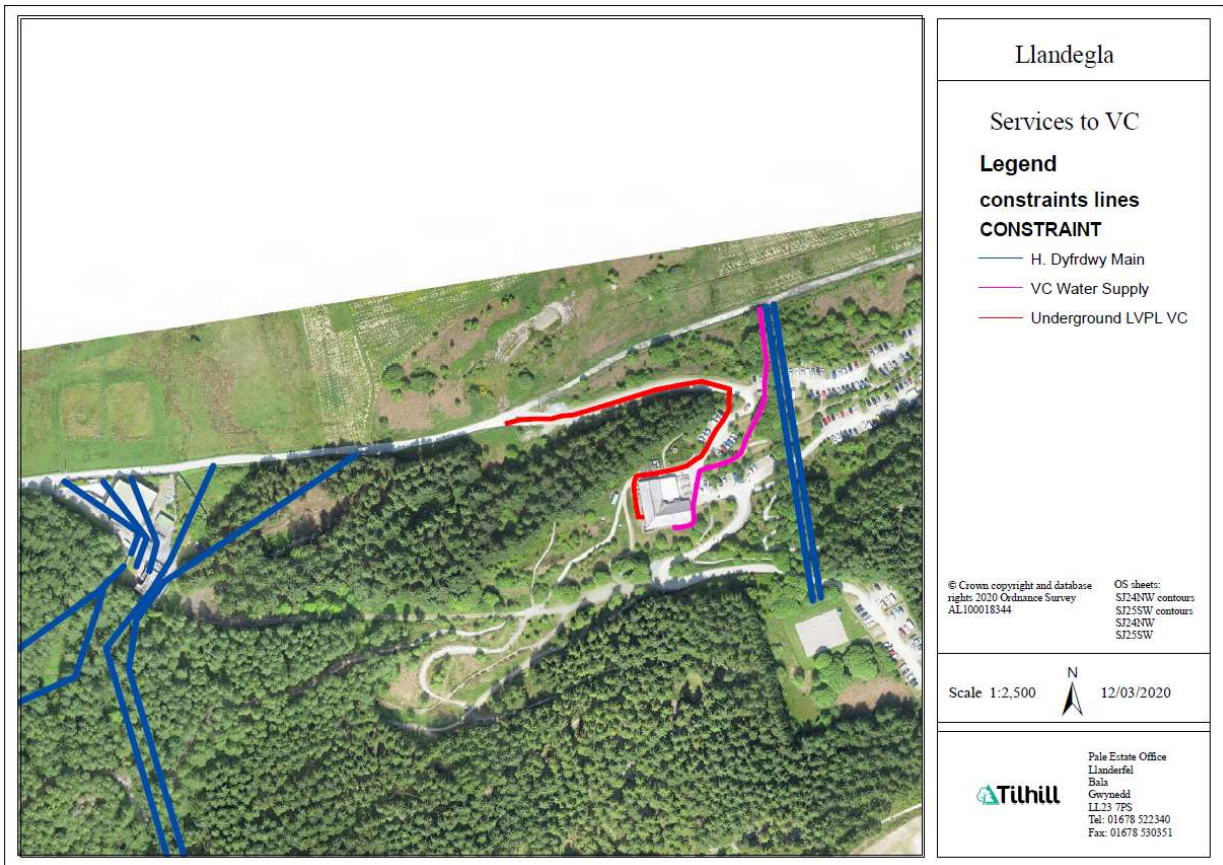
- 2.1 The application site is located within Coed Llandegla, which extends to approximately 650ha of predominately commercially planted coniferous trees situated south of the A525 between the villages of Llandegla, approximately 3Km to the west, and Bwlchwyn, some 6Km to the east.
- 2.2 The site covers an area of approximately 1.5ha and is located at National Grid Reference (NGR): 323785, 352316. The site is bounded to the north by an unclassified single track road, which has multiple passing places along its length, which provides connectivity to the A525 and access to the Visitor Centre. The western boundary is defined by a small watercourse and chain link fencing to a Water Treatment Plant.



**Figure 1: Site Location**

- 2.3 The site is located in the open countryside. The site is also located within the Clwydian Rand and Dee Valley Area of Outstanding Natural Beauty (AONB). The area is designated as being a Mineral Safeguarded Area (for sand and gravel).
- 2.4 The site comprises plantation woodland of sitka spruce. Tree planting on the site appears to have been carried out in the early 1970s as one block and there is little age or species diversity. The planted trees are ready for commercial felling. Some native species of trees, shrubs, vegetation and grasses are growing along the periphery of the site and where trees have been blown over or felled. Mosses and ferns are well established on the forest floor.

- 2.5 Two ditches cross the site running east to west and a small area of marsh has formed adjacent to road on the western boundary. The watercourse on the western boundary feeds into the Nant y Fridd Reservoir. Small areas of the site adjacent to the watercourse and parts of the ditch system have been identified in the Flood Risk Assessment Map for Wales as at Low Risk of flooding from surface water and small water courses. The area is within a Phosphate Sensitive SAC Catchment Area relating to the River Dee. The site is within a groundwater vulnerability area and a nitrate vulnerable zone.
- 2.6 Land uses adjacent to the site is either forestry or poorly drained rough grazing and moorland. The Ruabon and Llantysilio Mountain & Minera Site of Special Scientific Interest (SSSI) boundary runs approximately 0.6Km to the southeast of the site and the Llandegla Moor SSSI boundary 1.0Km to the northwest. The Unified Peat Map Wales shows shows a surface peat layer about 0.1Km to the north of the site.
- 2.7 The nearest listed building to the site is the Grade II Listed Ty Hir, located 700m to the east-south-east and which is separated from the site by Llandegla Forest. A Scheduled Monument, the Casgan-Ditw Round Barrow, is located 500m to the northwest of the site but there is no intervisibility due to intervening topography, which rises to the east of the scheduled monument, and vegetation including hedgerow and wooded areas.
- 2.8 Two water mains pass through the site, as shown in Figure 2, below.



**Figure 2: Utilities Infrastructure**

2.9 The Landmap Designation Summary for Coed Llandegla is:

*‘An extensive and uniform conifer woodland plantation of little interest but providing access along tracks to Pendinas Reservoir which is a small open water body to the east. Long distance footpath Offas Dyke also runs across the area. Views are highly limited by the dominant and enclosed vegetation, with little available views out to the surrounding countryside. Recent pockets of forest have been cleared but these are not widely apparent’.*

2.10 The Landmap Recommendations for Coed Llandegla are:

*Conifers dominant and possibly a little oppressive but improves and is more open near top of hill. Would benefit from opening up of glades and viewpoints out of area and diversification of plantation edge with more broadleaf native species where possible; Enhance and diversify the forest cover and create more glades; Diversify species especially at plantation edge with broadleaf native species.*

### 3.0 The Proposed Development

- 3.1 The intention is to provide up to 14 prefabricated self-contained lodges comprising a mix of 2 person and 4 person units each with a secure bike store and external decking sitting area. Each unit will have a small kitchen and shower room. One unit will be designed to be accessible to all.
- 3.2 The lodges will be of prefabricated construction but will be situated on concrete pad foundations beneath a steel or timber frame. Terraces would be installed around the lodges once installed with secure bike storage provided below or adjacent. Lodges would be supplied with electricity and mains water, with foul drainage connections to a new water treatment system. These are therefore permanent structures.
- 3.3 Units will be separated from each other by a distance of at least 6m to provide a degree of privacy and also fire separation between units and to comply with local planning requirements.

#### The Parameters Plan

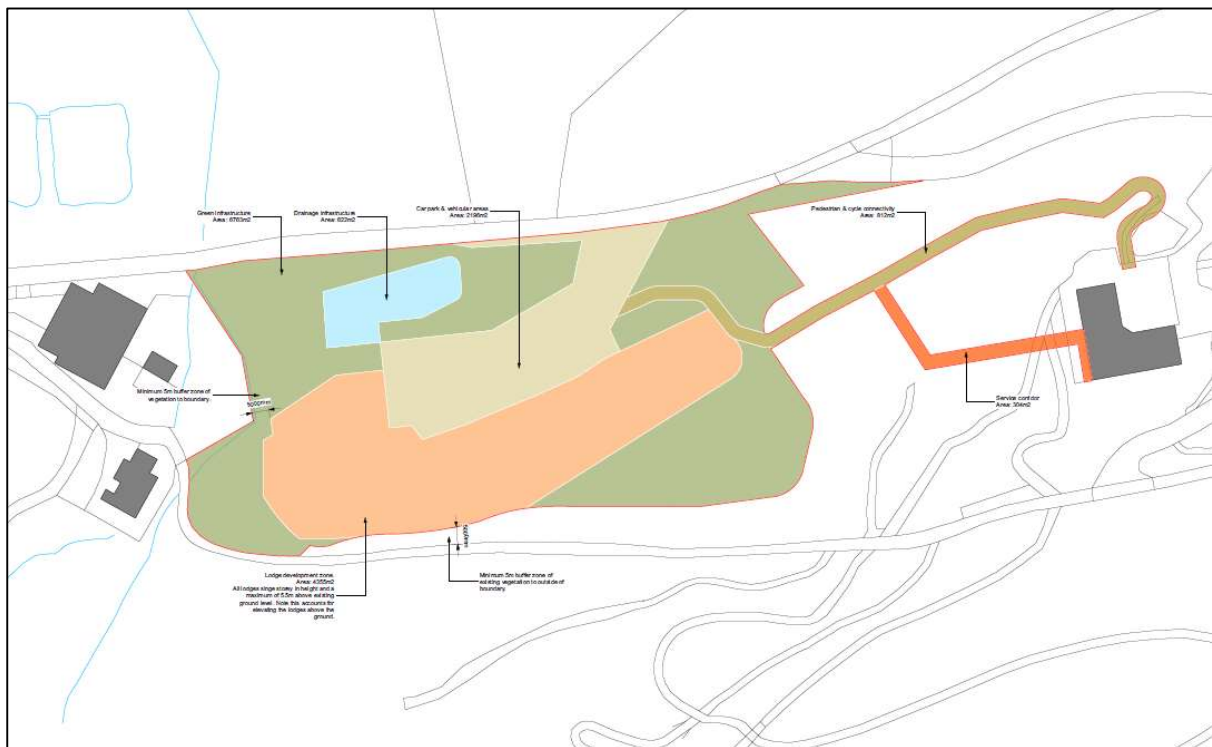


Figure 3: Parameters Plan



## Access, Movement and Parking

- 3.7 Vehicular access and egress will be provided at the central northern edge of the site from the unnamed rural road and will take the form of a simple give-way junction. The access will be located at an existing break in the tree line to retain the natural landscape and minimise the impact upon the existing trees. The access point is also positioned away from the passing points along the unnamed rural road.
- 3.8 The access road will be constructed from compacted stone and gravel, which will be site-won where material is available. Sandstone is present at very shallow depths in this location and a topsoil strip may be sufficient to reveal suitable material that could be used in situ. There will be no painted road markings and the road will therefore have an informal character.



**Figure 5: Proposed Access Arrangements**

- 3.9 The units will be linked for pedestrians and cyclists by a hierarchy of paths connecting the parking area, lodges and Visitors' Centre. Paths will be permeable and informal in character, using compacted stone or timber walkways, and will follow routes that will relate to the contours and retained features of the site.
- 3.10 Parking will be provided on site for 20 cars, including 1 disabled parking space. The car park would comprise compacted gravel (made of local stone) that provides a suitable base for lodge delivery and lifting. Surfaces in the parking area will be permeable with timber edging providing an informal rural appearance.

- 3.11 The car park has been designed to allow access and turning for large vehicles including fire engines, bin lorries and cranes for lodge delivery and installation. All lodges are positioned within 45m of the car park to comply with access requirements for emergency vehicles.
- 3.12 The redevelopment proposals include 4 electric vehicle (EV) charging points within the overall 20 car parking spaces. These will be for use by residents of the development. The other parking bays will be fitted with ducts to enable future installation of charging points as demand increases.
- 3.13 Secure storage for bicycles will be provided for each lodge, with one space provided per bedspace. This would be provided either beneath the proposed terraces where the position of the lodge and topography allows, on the terraces or adjacent to the lodges in a lockable bike storage box.
- 3.14 The access junction and car parking would be delivered as part of the first stage of construction.

### **Landscape Strategy**

- 3.15 The landscape strategy has been developed by the project landscape architects and masterplanners, Make Space, in consultation with the project ecologist, Marches Ecology and project arborists, Amenity Tree.
- 3.16 Amenity Tree has advised that the spruce trees on the site are growing as a sheltered group, and they strongly discourage retention of any trees due to the high probability of subsequent windblow into the site in the future. It is evident on site that many trees have fallen due to windblow and this is expected to continue in the future. As such, the development proposals include the removal of all plantation sitka spruce identified as Woodland Block 1 and individual trees T1-T3, as defined in the tree survey report. Native tree species, which have already started to colonise the clearings created by fallen spruce, will be retained and further growth of native species will be encouraged through the retention of surface soils in their current state across most of the site. This process of natural regeneration will be supplemented by tree and scrub planting around the site edges to provide
- 3.17 The proposed tree removals and native species planting along the road frontage would be prioritised as part of the first phase of development to promote the rapid natural regeneration of the site and to provide enhanced screening and integration of the development into the landscape.

## **Utilities**

- 3.18 As stated in Section 2, two water pipelines run across the site. The layout of the proposed development has been designed to exclude development from these pipelines routes and allow maintenance access should it ever be required.
- 3.19 Electrical distribution will be below ground in service corridors, as identified on the parameters plan, connecting the visitors' centre to the development area via the footpath route and car park.
- 3.20 The services corridor would also include drainage infrastructure, which would comprise 300mm buried pipes (although this may reduce to 225mm or 150mm subject to further consideration at the detailed design stage) or, where tree roots/topography presents obstacle to burying, a shallow dig and/or mound over.
- 3.21 There will be no mains gas supplied to the site.

## **Servicing**

- 3.22 Servicing and delivery activity, including waste collections, will take place within the site from the two-way access at the central northern area of the site. Refuse vehicles will enter from the main vehicle access and will temporarily stop in close proximity to the proposed bin store, located adjacent to the car park.
- 3.23 The lodges will be serviced by Oneplanet Adventure staff, who will carry out cleaning, refuse removal and other housekeeping duties. Storage of linen and other housekeeping products will be at the visitors' centre.

## **Surface Water Drainage Strategy**

- 3.24 The proposed site layout includes a surface water attenuation basin, the reduce the rate of discharge of surface water from the site in accordance with statutory requirements. The drainage infrastructure is shown on the parameters plan and illustrative site layout, and is described in detail in the Drainage Strategy report.

## **Foul Drainage Strategy**

- 3.25 The site is located in a rural area and is not served by public sewers. Therefore, a private package sewage treatment plant will be required to serve the development. The new private package sewage treatment plant will be located in the north-western extent of the site to

facilitate gravity drainage. Treated effluent will be discharged to the watercourse along the western site boundary, subject to obtaining consent from NRW.

- 3.26 Treatment of wastewater from the development and effect of phosphorus load on the River Dee SAC has been given careful consideration. A whole site approach is proposed whereby foul flows from the proposed holiday lodges together with foul flows from the existing OnePlanet Adventure café / toilets will be discharged to a new package treatment plant. The foul drainage proposals are considered to provide significant betterment in terms of phosphate loading, whereby the existing OnePlanet Adventure Café / toilets currently discharges to a septic tank which provides little to no phosphate removal. The septic tank currently drains to a small pool which overflows to ditches downstream. The septic tank will be decommissioned as part of the development with the new package treatment plant sized to accommodate peak foul flows from holiday lodges as well as the OnePlanet Adventure café / toilets.

### **Sustainability and Energy Strategy**

- 3.27 Denbighshire County Council has declared a climate change emergency and has amended its principals of decision making in the Council's Constitution. Planning decisions must therefore be considered having regard to tackling climate and ecological change as well as the sustainable development principles and the well-being of future generations.
- 3.28 The proposed lodge units will have a low carbon footprint using FSC certified timber for the structure and cladding and will be well insulated to ensure they are highly energy efficient.
- 3.29 Prefabricated construction is a very efficient method of building. Waste generated in the factory setting is far lower than the equivalent building being built on site and is much more easily recycled. The preferred lodge supplier is a Welsh company based in Pembrokeshire, meaning that transportation of the finished lodges is over a modest distance.
- 3.30 Within the lodges, low energy fittings and lighting will be used throughout as well as low flow water fixtures and fittings. No washing machines will be provided to minimise water use and disposal.
- 3.31 In terms of energy, the objective is to provide the majority of the site's energy needs from renewable technology using solar PV panels mounted on the Visitor Centre roof. This system will be used to power the visitor's centre and provide hot water for each lodge during daylight hours. Battery storage may be added to the system to further capture the solar electricity for use in lodges in the evenings. A separate full application for a roof mounted solar PV array has been submitted separately to the outline application. To ensure that the impacts of these

works are considered cumulatively, the LVIA for the outline application takes the proposed PV array into account.

### **Construction Principles and Phasing**

- 3.32 Tree removal, planting to the site frontage, the creation of the access and car park would be carried out as part of the first phase of works.
- 3.33 Compacted gravel pathways would be constructed to the site of each lodge. These pathways will be sufficient to allow access to a small tracked excavator suitable for digging out the individual lodge foundations.
- 3.34 Areas outside of the specific areas for lodges/car parking/pathways/drainage infrastructure would remain unaffected by construction activities.
- 3.35 The foundation design for each lodge would comprise concrete pad foundations with a steel or timber frame mounted on top to provide a level platform up to 1.5m above ground level.
- 3.36 Lodges would be delivered to the central car park area of the site as a single piece or in two pieces, after which they would be craned into position, secured to the foundations and connected to utilities.

## 4.0 The Need and Justification for the Proposed Development

- 4.1 Originally opened in 2006, the OnePlanet Adventure Mountain Biking Centre is a local success story, drawing 160,000 visitors to the area each year and provides a cafe, bike shop with hire, workshop facilities and parking for about 300 cars. The facility currently employs ten full time staff and sixteen part time staff and has established supply chain relationships with local producers, who supply the food and drinks served in the café.
- 4.2 Despite the success of the venue as an active tourism destination, the business is heavily reliant on retail sales, much of which is conducted online, for its ongoing viability. Around two thirds of total income is derived from retail, with the remaining third coming from food and beverage, parking, repairs and maintenance and training courses. This overreliance on retail leaves the business highly exposed to changing consumer behaviour within a very competitive marketplace.
- 4.3 To develop business resilience and secure its long-term future, Oneplanet Adventure has identified a pressing need to diversify its offering and reduce its reliance on the retail part of the business. Given the local policy support for increasing visitor overnight stays, the availability of suitable land, the established brand and customer base, and the pre-existence of a central facilities building, Oneplanet Adventure has identified short term holiday rental accommodation as the preferred option for diversification. Given the location within a forest, there are no buildings that could be converted within the ownership of the applicant and, therefore, the only viable option for the delivery of overnight accommodation is the construction of new purpose-built structures.
- 4.4 Other diversification opportunities were considered but set aside in favour of the provision of accommodation. This included a proposal to increase the number of potential visitors by significantly expanding the car parking provision at the site. The plans, which were drawn up in 2019, included parking across the site of the proposed development as well as expansion of the existing car park eastwards. However, the applicant would prefer to increase dwell time and spend of existing visitors rather than seek to attract significantly more individual visitors. This is an objective that accords with the ambitions of Denbighshire County Council's Tourism Strategy 2019 -2022.
- 4.5 The applicant has considered the type of accommodation to provide, based upon existing local accommodation options. Although there are several B&Bs in the local area, there is only one comparable accommodation provider within 5km (Llandegla Fisheries), but their offer is primarily comprised of camping or touring pitches. The lodge offer at Llandegla Forest would

therefore be complementary rather than in competition with Llandegla Fisheries as no camping or touring is proposed. Further afield, Abbey Farm and Cae Main provide accommodation options that are quite different in style to that proposed at Llandegla, and Coed Y Glyn, which has the most similar offering in terms of style and setting, are all located over 5km from the site. Crucially, none of these accommodation options provide bike washing facilities, secure bike storage, workshop facilities or any other services specifically designed for mountain bikers, as would be the case at Llandegla. Therefore, the applicant considers that the design and specification of the proposed development reflects a specific local need for accommodation in terms of location, type, and bike facilities.

4.6 Oneplanet Adventure has prepared a business plan to evaluate the potential effect of the development on the business. In this plan, occupancy rates are predicted to be approximately in line with the following, as suggested by the Wales tourism accommodation survey 2019.

Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Average
40%	55%	65%	65%	85%	95%	75%	55%	40%	35%	40%	45%	58%

4.7 On the basis of the above, it is envisaged that the percentage of total revenue derived from retail could fall to around 50%. This would result in significantly less reliance on one part of the business and provide a more stable spread of revenue streams, thereby increasing long-term viability.

4.8 The increase in revenue from visitors from the provision of accommodation will allow for increased reinvestment in the infrastructure of the business, ensuring the future of the business as a leading activity tourism provider for the future of Denbighshire.

4.9 The development once completed will provide direct employment for two additional full-time members of staff, which is a relatively small but nonetheless important contribution to the local economy. Further benefits will also be gained for the local producers Oneplanet Adventure already utilises within the catering part of the business, due to the increased demand for breakfasts, evening meals, drinks and snacks from overnight guests. It is also reasonable to assume that many overnight visitors, particularly repeat visitors, will frequent other establishments for drinks and evening meals during their stay, further supporting the wider local economy.

4.10 On the basis of the above, it is clear that the proposed development responds to a specific need to diversify the existing business to ensure long-term stability and viability for an important local attraction and employer. The proposed development of 14 lodges is modest



in scale and certainly proportionate to the number of visitors – 160,000 annually – who already make use of the trails. It is considered that option of increased visitor dwell time and spend is a preferable option when compared to the expansion of car parking to increase overall visitor numbers. This option would also generate greater supply chain benefits and additional visitor spending in the wider local economy.

## 5.0 Planning Policy Appraisal

- 5.1 Planning applications are assessed against the policies contained in the adopted Denbighshire Local Development Plan (LDP) and in the guidance contained in relevant Supplementary Planning Guidance Notes (SPGs), together with national planning policy and guidance set out in Welsh Government's Planning Policy Wales Edition 11 (PPW 11 - February 2021), Future Wales – The National Plan 2040 and Technical Advice Notes (TANs).
- 5.2 The following sections present a summary of the relevant policies, as identified by Denbighshire Council in their pre-application advice, and an explanation of how the proposals have been designed to comply with their requirements.

### **National Planning Policy**

#### ***Planning Policy Wales 11***

- 5.3 Planning Policy Wales 11 (PPW 11) supports tourism in rural areas where it provides a healthy and diverse economy. Development should be sympathetic in nature and scale to the local environment. Tourism is encouraged where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion and proposals for diversification, new startups and micro-businesses should also be encouraged, where appropriate, to generate new job and wealth-creating opportunities. PPW 11 requires planning authorities to give great weight to conserving and enhancing the natural beauty of AONBs, and should have regard to the wildlife, cultural heritage and social and economic well-being of the areas. The special qualities of designated areas should be given weight in the development management process. Proposals in AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered.
- 5.4 The proposed development fully complies with the objectives of PPW, given the potential to support a local business that provides employment and supply chain benefits as well as attracting 160,000 visitors to the area annually. The proposals seek to build on this success, whilst also being proportionate to the existing attraction and sensitively designed to respect and enhance the special character of the AONB.

### ***Future Wales – The National Plan 2040***

- 5.5 The National Plan states that tourism is an important sector to the economy across the North of Wales. Opportunities to support coastal resorts and attractions and new outdoor and active facilities should be supported. The re-development of former industrial sites across the North for adrenaline activities, including zip-wires, trampolining and surfing, demonstrate the potential to build on the region’s rich heritage and develop new attractions. Strategic and Local Development Plans should consider existing and potential new tourism areas, the type of visitors they attract, and the infrastructure required to support growth.
- 5.6 This policy strongly supports the type of development proposed at Llandegla Forest, with mountain biking sitting comfortably within the list of adrenaline activities. As described previously, Oneplanet Adventure has identified overnight accommodation as the most appropriate way to secure sustainable growth and viability of the business, and continue to attract high spending visitors to the area.

### ***TAN 5 Nature Conservation and Planning (2009)***

- 5.7 Technical Advice Note 5 seeks developments to achieve net biodiversity gain. The Landscape General Arrangement plan establishes the commitment to provide net benefit for biodiversity through the creation of new areas of habitat. The proposal includes planting of a new area of wet woodland along the watercourse by the western boundary with a new pond to be linked to this watercourse. Both ‘wet woodland’ and ‘ponds’ are priority habitats listed on Section 7 of the Environment (Wales) Act 2016. The existing small area of wet woodland is to be retained although some disturbance may occur during the creation of the ditch from the attenuation pond. The attenuation pond would also provide habitat that may be of some value for biodiversity though it would be managed for its primary function.
- 5.8 The proposal also includes a large area where natural regeneration of native broad-leaved woodland would be promoted. ‘Upland oakwood’ is a priority habitat and this area could provide such habitat in the medium to long-term. Planting of native trees would be limited to those areas where it would be required for screening purposes. A band of native scrub would be planted along the northern boundary to grade the woodland edge down to the lane.
- 5.9 The area around the car park/ vehicle access would be more open with natural regeneration of moorland vegetation promoted. Once established it is likely that these habitats would increase the biodiversity value of the site and therefore have a positive impact.

### ***TAN 6 Planning for Sustainable Rural Communities (2010)***

- 5.10 TAN 6 states that planning authorities should promote the expansion of established businesses by setting out in their development plans the criteria against which planning applications for employment uses will be assessed. This should include supporting the expansion of businesses that are currently located in the open countryside provided there are no unacceptable impacts on local amenity.
- 5.11 As demonstrated in this planning statement and the documents supporting the planning application, there would be no long-term adverse effect of the development on the landscape, traffic, visual amenity or drainage infrastructure. The type of development proposed would not generate additional demand for social services such as education or healthcare and would provide holiday accommodation in an appropriate and managed location, serving demand that is all too often met by conversions of family homes.

### ***TAN 12 Design (2016)***

- 5.12 TAN 12 aims to promote sustainability through good design. In particular, it promotes the careful consideration of five key areas, defined as: Access, Character, Community Safety, Environmental Sustainability and Movement.
- 5.13 The Design and Access Statement prepared by Make Space demonstrates the high quality of the proposed development and a considered approach to landscape and building design. The proposals have been developed in conjunction with a range of technical advisers including ecologists, landscape architects, transport consultants and drainage engineers, with a view to delivering a development that responds to the local character, respects environmental features, and creates a safe, user-friendly and beautiful place.

### ***TAN 13 Tourism (1997)***

- 5.14 TAN13 states that tourism comprises a range of different, but interdependent activities and operations which overlap with sport, entertainment, the arts and other recreation and leisure activities. It makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season. While it cannot be regarded as a single or distinct category of land use, the issues it raises should be addressed in preparing or revising development plans and may feature in development control decisions.

- 5.15 This statement illustrates that each development must be considered in its context. In this case, the proposed development should be considered in terms of its relationship to the existing sports and outdoor activity centre when considering its acceptability.
- 5.16 TAN13 focusses on the development of static caravan sites, which it says can be 'intrusive' in the landscape. Whilst the proposed lodges will be built in a manner which complies with the definition of a caravan in the Caravan Act in terms of its transportability and dimensions, the proposed lodges bear no resemblance to traditional static caravans, and along with the proposed landscape improvements, would enhance landscape rather than intrude upon it.

#### ***TAN 18 Transport (2007)***

- 5.17 TAN 18 states that an efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society but notes that transport, in particular road traffic, can also have negative impacts on human health and the environment.
- 5.18 Potential impact on the highway network has been considered in the submitted Transport Statement, and this found that the development will not have a material impact in terms of congestion and capacity, thus passing the severity test. The internal layout of the development allows increased permeability for cyclists and pedestrians, and also gives pedestrians priority throughout with no cars permitted to travel further into the site than the car park adjacent to the access point.
- 5.19 As is to be expected of a development at a mountain biking centre, secure cycle parking will be provided at a ratio of one space per bedspace. Bike storage for employees is already provided at the existing visitor's centre.
- 5.20 The site is also designed to be accessible, with one fully accessible lodge proposed along with associated disabled parking and cycle storage suitable for adapted bicycles.

#### ***TAN 23 Economic Development (2014)***

- 5.21 TAN 23 indicates that economic development is that which sustains existing jobs as well as creating new ones, and which generates wealth, jobs and income. The proposed development therefore represents economic development.
- 5.22 In terms of rural development, TAN 23 states that development on unallocated sites could be permitted if the resulting benefits outweigh any adverse impacts of the development. Proposals on land not identified in the plan will often come from established businesses wishing to expand or modernise. This is relevant to the proposed development, where an

established business is seeking to expand and diversify to ensure its longevity and viability in a sustainable and considered way.

## **Local Planning Policy Appraisal**

### ***LDP Policy RD5 The Welsh Language & the Social and Cultural Fabric of Communities***

5.23 The floor area of the development will be less than 1000m<sup>2</sup> and is therefore below the trigger for requiring a Community Logistic Statement. This notwithstanding, Oneplanet Adventure is committed to promoting the Welsh language through the use of dual language signage, including dual language naming of trails and lodges.

### ***LDP Policy PSE 5 - Rural Economy***

5.24 The Policy states:

*In order to help to sustain the rural economy, tourism and commercial development, including agricultural diversification, will be supported throughout the County subject to detailed criteria, which include making a significant contribution to sustainable development and recognising the special status of the Area of Outstanding Natural Beauty/Area of Outstanding Beauty. Appropriate employment proposals for both conversions and new build outside of development boundaries will be supported provided the following criteria are met:*

*i) the proposal is appropriate in scale and nature to its location;*

5.25 The scale of the development is small at just 14 lodges and is proportionate to the scale of the mountain biking centre and the number of visitors it currently receives. It is designed to cater to existing visitors and not to attract additional visitors. The proposals have been designed from the outset to respect and enhance their surroundings through the restoration of broadleaved woodland in an area of plantation woodland, which will be much more in keeping with the special character of the AONB.

*ii) any suitable existing buildings are converted or re-used in preference to new build; and*

5.26 There are no suitable buildings available at the existing business premises or on the proposed site that could be converted for overnight accommodation.

iii) *proposals for new buildings are supported by an appropriate business case which demonstrates that it will support the local economy to help sustain local rural communities; and*

5.27 A summary of the business case is presented in section 4 of this planning statement.

iv) *within the AONB/AOB, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas, take full account of and seek to enhance the nature and distinctive qualities of the local landscape. In line with national policy any proposals that are considered to be detrimental to the quality of the AONB and World Heritage Site will be refused.*

5.28 The landscaping strategy accords with the Landmap Recommendations to improve the quality of the existing landscape of this area. As stated above, the proposals have been designed to respect and enhance their surroundings through the restoration of broadleaved woodland in an area of plantation woodland, which will be much more in keeping with the special character of the AONB. This approach has been developed with the project ecologists and landscape consultants and evaluated in the LVIA, which found that the development would have a positive effect over the long term.

#### ***LDP Policy PSE12 – Chalet, static and touring caravan and camping sites***

5.29 Policy PSE12 states that proposals for new static caravan sites will not be permitted. Whilst the proposed lodges will be built in a manner which complies with the definition of a caravan in the Caravan Act in terms of its transportability and dimensions, the proposed lodges bear no resemblance to traditional static caravans and will have a permanence that distinguishes them from static caravans.

#### ***LDP Policy PSE 14 – Outdoor activity tourism***

5.30 The Policy states:

*Development proposals that expand or reinforce the tourism offer of the County in the outdoor activity sector will be supported provided the following criteria are met:*

i) *the development is appropriate to its setting and within the capacity of the local environment and infrastructure, particularly within and adjoining the Area of*

*Outstanding Natural Beauty, Area of Outstanding Beauty, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas. In line with national policy any proposals that are considered to be detrimental to the quality of the Area of Outstanding Natural Beauty and World Heritage will be refused; and*

5.31 The scale of the development is small at just 14 lodges and is proportionate to the scale of the mountain biking centre and the number of visitors it currently receives. It is designed to cater to existing visitors and not to attract additional visitors. The proposals have been designed from the outset to respect and enhance their surroundings through the restoration of broadleaved woodland in an area of plantation woodland, which will be much more in keeping with the special character of the AONB.

*ii) that any suitable existing buildings are converted or re-used in preference to new build;*

5.32 There are no suitable buildings available at the existing business premises or on the proposed site that could be converted for overnight accommodation.

*iii) necessary mitigation measures are included and the proposals would not have an unacceptable impact on the local community; and*

5.33 Landscaping and restoration of the site is an integral part of the development and there no residential properties within 350 m of the site that could be affected by the development activities.

*iv) chalet development in association with outdoor activity tourism will only be permitted if a significant need is demonstrated and there are no opportunities to use or convert existing buildings for tourist accommodation.*

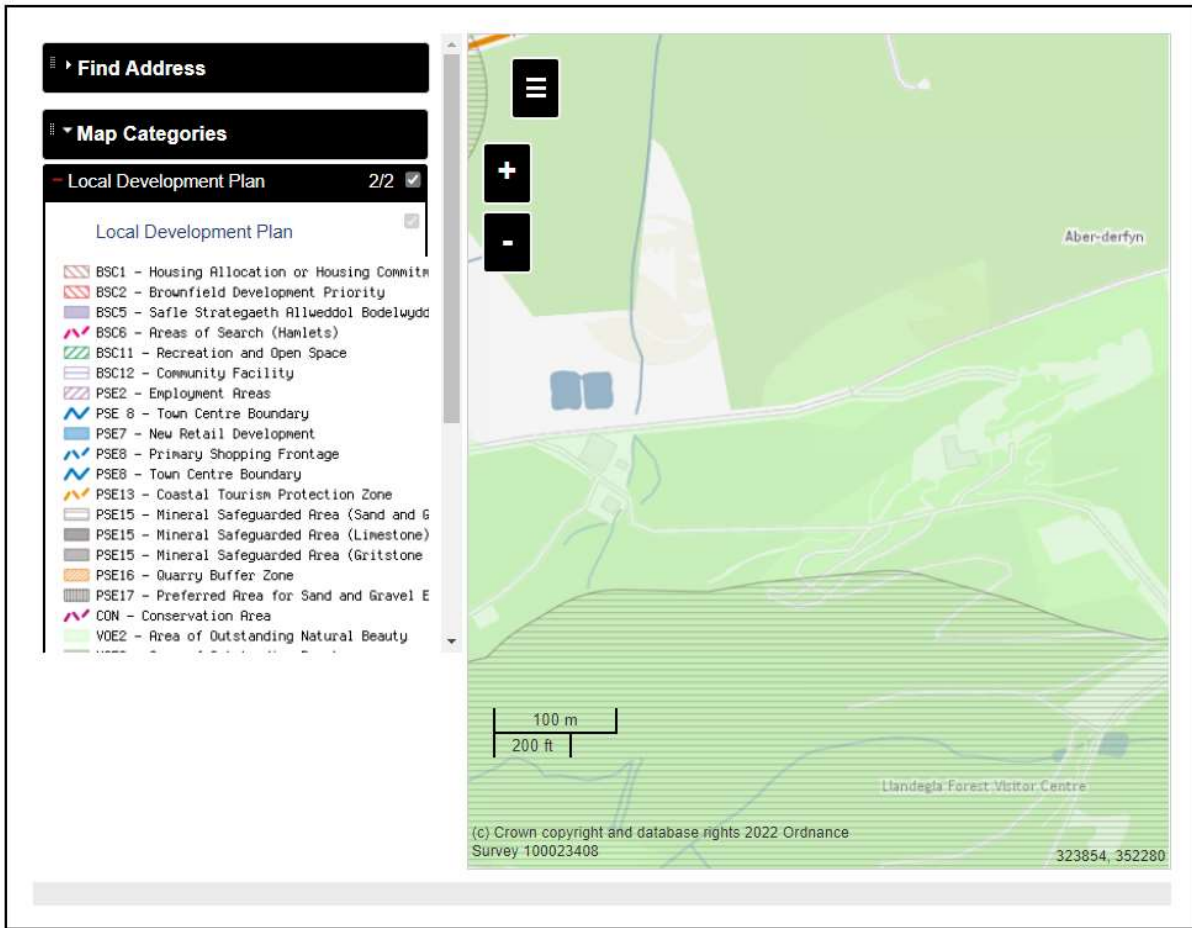
5.34 The Council's Tourism Strategy 2019 -2022 recognises that 'We have a limited number of places for tourists to stay overnight, so that the ambition for events and attractions is limited by the number of people who are able to stay locally.' This confirms the need for such

accommodation from the Council's perspective and the need from the applicant's perspective is presented in Section 4 of this planning statement.

- 5.35 As stated above, there are no suitable buildings available on the site of the existing business.
- 5.36 The justification for Policy PSE 14 states that *'Denbighshire is well placed to take advantage of the growth in the outdoor activities sector. The success of current facilities such as the **Llandegla Mountain Bike Centre** should be built upon and encouraged. Expenditure by participants in outdoor activities is often high and the County is supportive of developments that will encourage sustainable growth in this sector within environmental capacity limits. Development proposals, particularly within the Area of Outstanding Natural Beauty or Area of Outstanding Beauty, will require very careful consideration to ensure there will be no detriment to the landscape character.*
- 5.37 The Landscape and Visual Impact Appraisal, prepared by Planit-ie, has considered the baseline landscape conditions at the site and concluded that the site in its current condition does not contain any of the key characteristics which are considered to be typical of and valuable within the Landscape Character Area. The site also does not possess habitats that are identified as contributing to the 'special qualities' of the AONB.
- 5.38 The site has limited visibility from the surrounding landscape, given its location at the low lying position in the forest and being surrounded by plantation woodland. The proposed development includes the removal of the plantation spruce trees on the site and the subsequent enabling of natural regeneration, supplemented by edge tree and scrub planting that will help to restore the site to native broadleaved woodland, which is a habitat that is identified as contributing to the special quality of the AONB.
- 5.39 The short term visual and landscape impact from the removal of non-native trees (which were planted as a commercial crop and would be removed in the medium term in any event) and the installation of lodges will be outweighed by the long term benefits to the landscape from the restoration of native woodland that is in keeping with the surrounding landscape and the aspirations for the AONB.

***LDP Policy PSE15 – Safeguarding minerals***

- 5.40 The site is located outside of the mineral safeguarding area for sand and gravel which is located around 50m to the south at the nearest point. This is confirmed on Figure 6, below.



**Figure 6: Mineral Safeguarded Area to the South of the Site (Source: Denbighshire Adopted Local Development Plan Map)**

***LDP Policy PSE16 – Mineral buffer zones***

5.41 The site is not located within a mineral buffer zone.

***LDP Policy VOE1 - Key areas of importance***

5.42 Policy VOE1 seeks to protect designated areas from development that would adversely affect them. The site is not located within any of the identified statutory designated sites for nature conservation, which are listed as Ramsar sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR), Marine Nature Reserves (MNRs) and Local Nature Reserves (LNRs).

5.43 The site is within the wider catchment of the River Dee SAC, and, as such, the drainage design for the development has taken into account the need to address the issue of phosphates entering watercourses, which can lead to eutrophication of waterbodies, to comply with NRW

requirements. The drainage strategy includes the specification of a wastewater treatment system that removes phosphates as part of the treatment process before discharging to watercourses. This system will serve the proposed lodges but also the existing visitor's centre, leading to an overall betterment compared with the current conditions. This strategy has been detailed in the Drainage Strategy Report and Habitats Regulations Assessment Report, both prepared by Waterco and submitted with the planning application.

***LDP Policy VOE2 – Area of Outstanding Natural Beauty and Area of Outstanding Beauty***

- 5.44 The site is located in the Clwydian Range and Dee Valley AONB and a Landscape and Visual Impact Assessment (LVIA) has been conducted to evaluate the potential effects of the development upon the AONB and to inform the sensitive development of the site.
- 5.45 The LVIA, prepared by Planit-ie, has considered the baseline landscape conditions at the site and concluded that the site in its current condition does not contain any of the key characteristics which are considered to be typical of and valuable within the Landscape Character Area. The site also does not possess habitats that are identified as contributing to the 'special qualities' of the AONB.
- 5.46 The site has limited visibility from the surrounding landscape, given its location at the low lying position in the forest and being surrounded by plantation woodland. The proposed development includes the removal of the plantation spruce trees on the site and the subsequent enabling of natural regeneration, supplemented by edge tree and scrub planting that will help to restore the site to native broadleaved woodland, which is a habitat that is identified as contributing to the special quality of the AONB.
- 5.47 The short term visual and landscape impact from the removal of non-native trees (which were planted as a commercial crop and would be removed in the medium term in any event) and the installation of lodges will be outweighed by the long term benefits to the landscape from the restoration of native woodland that is in keeping with the surrounding landscape and the aspirations for the AONB.

***LDP Policy VOE5 – Conservation of natural resources***

- 5.48 Policy VOE5 seeks to ensure the conservation of protected species or designated sites of nature conservation and requires the submission of a biodiversity statement with planning applications where sites may be affected by development.
- 5.49 The application is supported by a Preliminary Ecological Appraisal, prepared by Marches Ecology. The landscape and ecological enhancement proposals have been informed by the

project ecologist These include the planting of a new area of wet woodland along the watercourse by the western boundary with a new pond to be linked to this watercourse. Both 'wet woodland' and 'ponds' are priority habitats listed on Section 7 of the Environment (Wales) Act 2016. The existing small area of wet woodland is to be retained although some disturbance may occur during the creation of the ditch from the attenuation pond. The attenuation pond would also provide habitat that may be of some value for biodiversity though it would be managed for its primary function.

- 5.50 The proposals also include a large area where natural regeneration of native broad-leaved woodland would be promoted. 'Upland oakwood' is a priority habitat and this area could provide such habitat in the medium to long-term. Planting of native trees would be limited to those areas where it would be required for screening purposes. A band of native scrub would be planted along the northern boundary to grade the woodland edge down to the lane.
- 5.51 The area around the car park/ vehicle access would be more open with natural regeneration of moorland vegetation promoted. Once established it is likely that these habitats would increase the biodiversity value of the site and therefore have a positive impact.

#### ***LDP Policy VOE6 – Water management***

- 5.52 Policy VOE6 requires that all developments eliminate or reduce surface water run-off from the site, where practicable. The run-off rates from the site should maintain or reduce pre-development rates. It also states that the effective use of permeable surfaces, soakaway and water storage areas should be incorporated in all new development where technically possible.
- 5.53 A Drainage Strategy has been prepared by Waterco, which has been developed in consultation with NRW and the Sustainable Drainage Approval Body. The report confirms that the hierarchy of drainage options has been appropriately considered and that the most appropriate solution for the site is to drain to the nearest watercourse, which is an unnamed watercourse that flows north along the western boundary of the site. Discharge to the watercourse on the western boundary at a limited discharge rate of 2 l/s appears to be feasible. A gravity connection can be achieved. In order to achieve a discharge rate of 2 l/s, attenuation storage will be required and an estimated storage volume of 147m<sup>3</sup> will be required to accommodate the 1 in 100 year plus 40% Climate Change (CC) event.
- 5.54 Attenuation storage will be provided in the form of a pond located in the lower north-western extent of the site as to facilitate gravity drainage. Other sustainable drainage systems will include french drains at the base of each lodge to collect rainwater from the roof. The french

drains will discharge to the existing ditches on site which will be formalised and extended as to connect to the proposed attenuation pond. A new ditch will be formed from the outlet of the attenuation pond to the watercourse on the western boundary. The ditch will flow through an existing area of wet woodland.

- 5.55 The proposed access road and car park will be formed from a permeable stone material. An interception drain (french drain) will be placed along the northern boundary of the road and car park to intercept runoff and direct it to the attenuation pond.
- 5.56 The overall drainage strategy has been designed to contribute to the amenity and biodiversity value of the development, having been developed in conjunction with the project ecologists, Marches Ecology, and the landscape designers, Make Space.

***LDP Policy ASA 3 – Parking standards***

- 5.57 Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. These policies reflect general principles set out in Planning Policy Wales (Section 8) and TAN 18 – Transport, in support of sustainable development. Details of the parking strategy are set out in the discussion under the Parking Standards in New Developments SPG, below.

***Supplementary Planning Guidance Note: Access for All***

- 5.58 In accordance with the requirements of this SPG, the development includes the provision of one lodge that will be fully accessible. This lodge will be positioned closest to the car park and will include level access for wheelchair users or others with mobility issues. The car park will include an allocated disabled parking bay and cycle storage in the accessible unit will allow sufficient space for an adapted bicycle. Details can be found within the Design and Access Statement.

***Supplementary Planning Guidance Note: Archaeology***

- 5.59 The Archaeology SPG sets out the requirements for planning applications where there exists some archaeological potential. The nearest listed building to the site is the Grade II Listed Ty Hir, located 700m to the east-south-east and which is separated from the site by Llandegla Forest. A Scheduled Monument, the Casgan-Ditw Round Barrow, is located 500m to the northwest of the site but there is no intervisibility due to intervening topography, which rises

to the east of the scheduled monument, and vegetation including hedgerow and wooded areas.

- 5.60 The very shallow soils at the site, as evidenced in areas where fallen trees have exposed the sandstone below, the sloping topography and the total woodland cover that has been present for many years suggests a low potential for archaeological remains to be present and therefore no archaeological investigation works have been carried out.

**Supplementary Planning Guidance Note: Clwydian Range and Dee Valley Area of Outstanding Natural Beauty**

- 5.61 The SPG sets out the special qualities of the AONB and identifies the ways in which new developments are required to protect and enhance them. In accordance with the requirements, a Landscape and Visual Impact Assessment has been completed by Plabnit-ie to evaluate the potential effects of the development upon the AONB and to inform the sensitive development of the site.
- 5.62 The LVIA has considered the baseline landscape conditions at the site and concluded that the site in its current condition does not contain any of the key characteristics which are considered to be typical of and valuable within the Landscape Character Area. The site also does not possess habitats that are identified as contributing to the 'special qualities' of the AONB.
- 5.63 The site has limited visibility from the surrounding landscape, given its location at the low lying position in the forest and being surrounded by plantation woodland. The proposed development includes the removal of the plantation spruce trees on the site and the subsequent enabling of natural regeneration, supplemented by edge tree and scrub planting that will help to restore the site to native broadleaved woodland, which is a habitat that is identified as contributing to the special quality of the AONB.
- 5.64 The short term visual and landscape impact from the removal of non-native trees (which were planted as a commercial crop and would be removed in the medium term in any event) and the installation of lodges will be outweighed by the long term benefits to the landscape from the restoration of native woodland that is in keeping with the surrounding landscape and the aspirations for the AONB.

**Supplementary Planning Guidance Note: Planning for Dark Skies – SPG for lighting in the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty**

- 5.65 The Planning for Dark Skies SPG sets out the principles that new developments should adhere to with the objective of avoiding light pollution within the AONB.
- 5.66 The applicant is committed to the principle of maintaining dark skies at the site to respect the character of the AONB and its aspirations to become a member of the Dark Sky Community. Therefore, best practice lighting will be used to minimise lighting and its effect on the landscape and protected species.
- 5.67 ILP (2011) guidance identifies environmental zones based on the night-time landscape character, for the purposes of establishing appropriate limiting design criteria. These environmental zones are described below.

Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity

- 5.68 As the site is located within an AONB, the appropriate Environmental Zone Category is **E1 Intrinsically Dark**. The lighting strategy has therefore been designed to comply with this standard as a minimum and the applicant invites the LPA to secure this commitment through a suitably worded planning condition.
- 5.69 In the event that the Environmental Zone categorisation changes between the issue of outline planning approval and the submission of reserved matters, the applicant commits to compliance with the zone that is applicable at the time.

*General Lighting Principles*

- 5.70 The following general principles for lighting are proposed, which are in compliance with the emerging SPG on Dark Skies.

Outside:

- Direct light to the place of need, not in a direction that disturbs neighbours or wildlife
- Angle lights downward, no unnecessary light above or near the horizontal
- Lamps of 500 lumens or less are enough for most domestic purposes
- Installation of lamps above 500 lumens should always be in dark night sky friendly fixtures that prevent upward light
- Switch lights off when not needed, use proximity sensors and timed circuits
- Light to the appropriate illuminance, do not needlessly over-light
- Avoid bright white and cooler temperature LED's of over 3000 Kelvin
- Install fixtures at the lowest possible height to achieve lighting levels
- Extinguish or dim external lighting after 2300 hours (curfew time)

Within buildings:

- Use and shut curtains and blinds at night
- Limit the size of picture windows, or add louvers to reduce the extent of night time illumination, where these are visible from beyond the site
- In new builds and replacement buildings, recess and shield internal lighting within ceilings or walls in rooms with picture windows

5.71 The E1 environmental zone classification requires the following design criteria for external lighting, which will be complied with as part of the detailed lighting design:

- Sky Glow                      ULR: 0%
- Light Intrusion              Ev: < 2 Lux
- Luminaire Intensity        I: < 2,500 cd
- Building Luminance        L: 0 cd/m<sup>2</sup>

#### *Lighting for Bats*

5.72 The design of the external lighting will avoid conflicts with the roosting, predation and movement habits of nocturnal species such as bats. Such conflicts can occur where artificial lighting encroaches into natural roosting, foraging and commuting areas; impacting on breeding behaviour, the size of the natural habitats and their capacity to support diverse species. The nature and make-up of the light can also attract insects and alter the predation patterns of nocturnal species. The following principles will be adhered to in the detailed lighting design:

- Compliance with the Bats and artificial lighting in the UK guidance.
- Sodium, mercury and metal halide discharge lamps will not be used on the site.
- Lower level bollard lighting will be installed, using LED lamp sources which emit light with no UV component.
- Any lighting columns required for safety or security would be below 3m in height, and the lamps would be shielded from lateral views to allow normal bat movement and activity above the installed lighting.

#### ***Supplementary Planning Guidance Note: Conservation and Enhancement of Biodiversity***

- 5.73 This SPG provides further advice on the consideration of biodiversity interests when submitting a development proposal and in particular with regards LDP policies RD 1, VOE 1 and VOE 5. It details the legislative framework and planning process including pre-application considerations, likely survey/ assessment requirements and standards for any report to be submitted.
- 5.74 All requirements have been observed in the carrying out of ecological surveys and the production of the Marches Ecology PEA Report.

#### ***Supplementary Planning Guidance Note: Trees and Landscaping***

- 5.75 The SPG provides further advice on the protection of trees and hedgerows along with planting of trees as part of proposed developments particularly with regards LDP policy RD 1. The planning application has been informed by a tree survey and arboricultural impact assessment, carried out by Amenity Tree. This includes details of the protection measures to be afforded to retained trees and method statements in relation to working practices in full accordance with the SPG requirements.

#### ***Supplementary Planning Guidance Note: Parking Requirements In New Developments***

- 5.76 The SPG Note states that for typical hotel developments there should be a minimum car parking provision of 1 space per 3 non-resident staff & 1 space per bedroom. For car parks associated with new employment premises, 5% of the total car park capacity should be designated (to include both employees and visitors). The council's policy would suggest a requirement of 20 car parking spaces (including 1 disabled parking spaces). The proposed quantum of on-site car parking (at 20 spaces for 14 lodges) for this development is therefore considered to be reasonable without representing an overprovision.

***Supplementary Planning Guidance Note: Planning and the Welsh language***

5.77 The floor area of the development will be less than 1000m<sup>2</sup> and is therefore below the trigger for requiring a Community Logistic Statement.

***Supplementary Planning Guide. - Caravans, Chalets and Camping***

5.78 The SPG states that, where new chalet development is proposed as part of an outdoor activity tourism proposal (policy PSE 14), this will be permitted where it can be demonstrated there is a lack of tourist accommodation to support the development, and there are no opportunities to use or convert existing buildings in the first instance. As has been demonstrated throughout this planning statement, there is not comparable accommodation suitable for mountain bikers in the local area and there are no other buildings on or around the site that could be converted. The need for the proposed development has also been clearly set out in section 4 of this report.

5.79 The SPG has been used to inform the development of the proposals. The indicative layout employs a minimum 6m offset between each unit in accordance with the guidance. This ensures safe separation distance between each lodge but also creates privacy for the end user.

5.80 The other requirements of the SPG include the requirement for a Transport Statement and a Landscape and Visual Appraisal have been prepared, which confirm that the proposals would have no significant effects on local amenity.

## 6.0 Summary and Conclusions

- 6.1 An outline planning application, with means of access, has been prepared in support of a proposed development of up to 14 holiday lodges as part of the Oneplanet Adventure mountain biking centre in Llandegla Forest, Denbighshire. A full planning application has also been prepared for a 23kWp solar PV installation on the visitor's centre roof.
- 6.2 The Llandegla Forest mountain biking centre is a well-established and successful visitor destination, attracting 160,000 visitors annually that employs ten full time staff and sixteen part time staff. Opened in 2006 the Centre now provides a café, bike shop with hire, workshop facilities and parking for about 300 cars. Oneplanet Adventure has developed the proposals with the objective of diversifying its operations, to reduce overdependence on its retail business. Alternative options including the expansion of parking facilities to increase visitor numbers have been rejected by the applicant in favour of providing additional services to existing guests in the form of high-quality overnight accommodation. This would help to ensure the ongoing viability of the business and support ongoing investment in the facility and its trails.
- 6.3 The expansion of the mountain biking centre is supported by local planning policy, with the Local Development Plan stating that *'the success of current facilities such as the **Llandegla Mountain Bike Centre** should be built upon and encouraged. Expenditure by participants in outdoor activities is often high and the County is supportive of developments that will encourage sustainable growth in this sector within environmental capacity limits.'* This policy confirms the acceptability in principle of the proposed development subject to demonstrating there being no unacceptable impacts upon the local environment.
- 6.4 Oneplanet Adventure has therefore worked with a team of specialist advisers to create a development proposal that not only secures the long-term viability of an important tourist attraction and delivers economic benefits but does so in a way that is sensitive and beneficial to the natural environment and promotes healthy active lifestyles. The commitment to the long-term enhancement and management of the landscape, the prioritisation of local employment and supply chains, the installation of renewable energy technologies and the specification of high-quality accommodation represents a development that contributes to all dimensions of sustainability, and which fully complies with planning policy.

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# Planning Statement

## Appendix A: EIA Screening Matrix

### Llandegla Forest Holiday Lodges

On behalf of Oneplanet Adventure Ltd

August 2022

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## Llandegla Forest EIA Screening Report

### Project Details

<b>Site</b>	Llandegla Forest, Debigshire, Wales
<b>Client</b>	Oneplanet Adventure
<b>Proposal</b>	<ul style="list-style-type: none"> <li>• 14 holiday lodges with associated access, car parking and landscaping.</li> <li>• Roof mounted solar PV system to the existing visitors' centre.</li> </ul>
<b>EIA Screening</b>	Under Schedule 2 Part 12. Tourism and Leisure (e) Permanent camp sites and caravan sites, as the area of the site exceeds 1 hectare

Screening criteria	Response	Is a significant effect likely
	Briefly explain reasons and, if applicable and/or known, include name of feature(s) and proximity to site(s)	Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.
<b>Natural resources</b>		
Will the project result in physical changes to the topography of the area?	<p>Yes</p> <p>The site is located on the edge of an area of woodland characterised by steep and variable topography. The site itself comprises sloping ground in the southern part of the site, which levels out as you move northwards towards the road.</p> <p>Design of the proposed development minimises topographic changes as lodges will be sited on concrete pad foundations and elevated from the ground on a</p>	<p>No</p> <p>Design of the proposed development minimises topographic changes, with groundworks being limited to the area within the footprint of the lodges. This would have no potential adverse impact on stability, drainage, or the wider landscape because of the tightly confined nature of the works. Therefore, no significant effects are anticipated.</p>

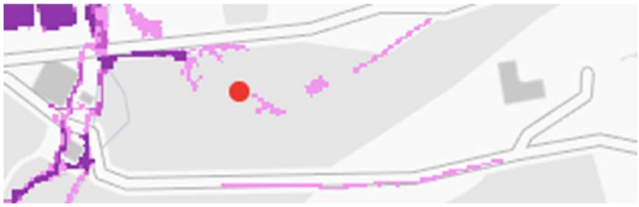
	<p>supporting structure. However, some minor cutting may be required for pods on the hillside, enabling them to blend into the landscape. The car park and access will maintain existing levels and landscape features are to be retained and incorporated into the design, thereby minimising ground disturbance and topographical changes.</p>	
<p>Will construction/operation of the project use non-renewable resources?</p>	<p>Yes</p> <p>Construction works will inevitably make use of materials such as concrete for foundations and a variety of materials within the lodges. However, lodges will be built off-site and transported to site fully assembled, which is a highly efficient means of construction that minimises material use and waste. The lodges will also be constructed with sustainable materials where possible, including FSC certified timber. The use of site-won materials will also be prioritised, such as the re-use of timber for pathway markers, outdoor seating or chipping, and the reuse of stone or gravel from any excavations for the creation of pathways.</p> <p>In terms of operational resources, the applicant is proposing to install solar PV at the existing hub building to meet the majority of electricity, heating and hot water demand from the proposed lodges (and the existing visitors centre). Whilst this also generates the use of resources, this impact would be outweighed by the long-term renewable energy generated.</p>	<p>No</p> <p>Sustainable building techniques and the reuse of existing materials are being employed to minimise resource use and waste arisings during construction. Therefore, there is not anticipated to be the potential for significant effects associated with resource use during construction.</p> <p>The proposed installation of solar PV at the visitors' centre would ensure that the lodges are operated sustainably in the long term by making use of renewable energy.</p>
<p>Are there any areas on/surrounding the site containing high quality/scarce resources that will be affected by the project?</p>	<p>No</p> <p>The site is predominantly comprised of Sitka Spruce planted for commercial use. The site is located within a wider area of commercial forestry, which is also used for</p>	<p>No</p> <p>The tree survey does not identify any high quality/scarce resources at the site. The loss of plantation woodland will be mitigated through the creation of native</p>

	<p>mountain biking. The site is not located within a Mineral Safeguarding Area.</p> <p>The proposals will result in the end of active forestry within the site itself but all other areas of commercial forestry in the surrounding area would remain unaffected and will continue to operate.</p> <p>Removal of trees within the site will be necessary to enable construction and safe operation. The tree survey determined the plantation trees to be of moderate quality, which does not represent a high quality or scarce resource. The landscaping plans to replace the plantation with native broadleaved woodland and an area of wet woodland would result in the creation of a more valuable resource in landscape and ecological terms.</p>	<p>broadleaved woodland and an area of wet woodland, which would deliver an ongoing improvement in biodiversity and landscape value over the long term.</p>
<b>Waste</b>		
<p>Will the project produce solid wastes?</p>	<p>Yes</p> <p>Construction wastes will inevitably arise but will be minimal due to the efficiencies associated with off-site production. Site-won materials such as timber and stone will be re-used on site to avoid the need to remove wastes from site.</p> <p>Operational waste will be generated by guests, but these will be very limited in volume as visitors will be encouraged to use the on-site café and other local venues during their visit. Wastes will be separated into recyclables and non-recyclables prior to collection.</p> <p>There is no potential for hazardous wastes associated with the construction or operation of the proposed development.</p>	<p>No</p> <p>The very limited amount of construction waste generated at the site would be appropriately sorted for recycling. Similarly, for operational waste, generation would be minimised, but recycling would be prioritised, and collections would be by carried out by an appropriately licenced commercial waste contractor.</p> <p>On the scale of the proposed development, and due to the benign types of waste anticipated, there would not be a significant impact associated with waste.</p>

Pollution and nuisances		
<p>Will the project release pollutants or toxic substances to the air?</p>	<p>No</p> <p>The lodges will be supplied with electricity only, with the solar PV system providing most of the energy needs on site. No mains gas will be supplied to the properties.</p> <p>There will be no emissions associated with gas or biomass boilers due to the use of renewable energy from solar PV at the visitors' centre.</p> <p>Vehicles of guests will access the site, but this is limited to 20 vehicles based on the number of spaces provided and will not represent additional trips as the lodges are being targeted at existing customers rather than new ones. In addition, 4no. EV charging points will be installed, with below ground cabling being fitted throughout the car park to enable further charging points to be installed in the future. This will encourage EV owners to make use of the facilities, which do not generate emissions.</p>	<p>No</p>
<p>Will the project cause noise and vibration, or the release of light, heat, energy, or electromagnetic radiation?</p>	<p>Yes</p> <p>The site is located within the Dee Valley area of outstanding natural beauty (AONB) and is therefore subject to the 'Dark Skies' scheme to maintain the naturally dark skies in the area. Any artificial light will be within specified levels to minimise light pollution, maintain night sky views and prevent negative effects of artificial light on biodiversity in the area.</p> <p>The site is in a remote location and therefore does not have any neighbours that would be particularly sensitive to the effects of noise.</p>	<p>No</p> <p>Lighting is designed to support 'Dark Skies' strategy to minimise wildlife disturbance and light pollution, preventing significant impacts from new lighting installations.</p> <p>Due to the lack of receptors to noise nearby to the site and the operation at the site to remain mostly unchanged, there will be no significant impact on noise pollution in the area.</p>

	<p>The lodges are designed with low energy lighting fixtures which will reduce heat/light/energy emissions. Light fittings along pathways will be proximity and time controlled to minimise lighting of the site to levels that are necessary for safety. Any lamps over 500 lumens will be in dark sky friendly fixtures that prevent upward light.</p>	
<p>Will the project lead to risks of contamination of land or water from releases of pollutants into surface waters, groundwater, coastal waters, or the sea?</p>	<p>Yes</p> <p>The site is in the River Dee special area of conservation (SAC) and is therefore protected under the 2017 Conservation of Habitats and Species Regulations, requiring extra care to be given to water treatments on site.</p> <p>Phosphates from washing powers, sewage and agriculture can enter rivers and cause eutrophication due to excess nutrients. Development has the potential to increase the phosphate load in rivers without appropriate controls or wastewater treatment. This has been raised in pre-application discussions with NRW as a primary concern for the development of the site. the applicant has therefore developed an appropriate drainage and water treatment system to address this matter.</p>	<p>No</p> <p>The project drainage consultant has developed a whole site approach to wastewater treatment, whereby foul flows from the proposed lodges together with foul flows from the existing OnePlanet Adventure café / toilets will be discharged to a new private package treatment plant.</p> <p>This wastewater treatment plan mitigates phosphate loading and improves the current water treatment at the existing café site, which has not been providing phosphate removal. The septic tank currently in use will be decommissioned in favour of the new system. in addition, no washing machines or dishwashers are to be installed to eliminate detergent usage, and phosphate free products will be given to guests.</p> <p>Taking the proposed drainage and mitigation strategy into account, the potential for significant impacts upon the SAC has been avoided.</p>
<p>Are there areas on/surrounding the site already subject to pollution or environmental damage?</p>	<p>No</p> <p>The historic uses of the site and surrounding areas are understood to be woodland and agriculture. There is therefore a low risk of any historic contamination events.</p>	<p>No</p>

Population and human health		
<p>Will there be any risk of major accidents during construction, operation or decommissioning?</p>	<p>No</p> <p>Best practice health and safety procedures will be followed during construction and installation of the lodges and the development areas would be closed to the public during the construction period.</p> <p>It is proposed that tree within the existing plantation woodland will be felled prior to occupation of the proposed development to avoid risks associated with wind throw.</p> <p>Lodges will all be sited within 45m of hardstanding to provide Building Regulations compliant access for fire engines.</p> <p>No major accident risk has been identified.</p>	<p>No</p>
<p>Will the project present a risk to the population and their human health?</p>	<p>No</p> <p>The site is remotely located and over 300m away from the nearest residential property. Noise nuisance and visual disturbance upon neighbours are therefore considered to be highly unlikely.</p> <p>Other site and surrounding area users include visitors to the mountain biking centre and occasional forestry workers. The type of development proposed does not pose a risk to people during its operation. During construction, the delivery and craning of lodges into place could present a short-term health and safety risk to mountain bikers and walkers, which would be managed through the closure of the construction zone to all visitors.</p>	<p>No</p>

	<p>The removal of large spruce trees that are currently susceptible to wind throw would reduce the potential risk to site users.</p>	
<b>Water resources</b>		
<p>Are there any water resources including surface waters on/surrounding the location which could be affected by the project, particularly in volume and flood risk?</p>	<p>Yes</p> <p>The site contains ditches which carry surface water across the woodland and ultimately to the watercourse on the western site boundary. The western boundary is at medium to high risk of flooding from small watercourses, with some areas across the site at low risk due to the ditches.</p>  <p>Flood risk map on site, dark purple is high flood risk from small watercourses, pink is low risk. All built development has been located outside of the flood risk areas.</p> <p>The proposed development would increase the rate of surface water run-off on site due to an increase in impermeable areas. Due to this, the drainage strategy has been carefully designed to prevent the flood risk increasing by providing attenuation basins to slow the discharge of water from the site.</p> <p>The existing ditches and watercourse will remain unaffected by the proposed development.</p>	<p>No</p> <p>The proposals include surface water attenuation to slow the flow of surface waters into watercourses and ensure that there would be no increase in the risk of flooding on or off site.</p>
<b>Biodiversity</b>		

<p>Are there any protected areas which are designated or classified for terrestrial, avian and marine ecological value, or any non-designated sensitive areas on/surrounding the area that will be affected by the project?</p>	<p>Yes</p> <p>The following sites of special scientific interest (SSSI) and special areas of conservation (SAC) are located in the vicinity of the site:</p> <ul style="list-style-type: none"> <li>- Berwyn and South Clwyd Mountains SAC 522m southeast and 756m northwest</li> <li>- Ruabon/Llantysilio Mountains and Minera SSSI 522m southeast</li> <li>- Llandegla Moor SSSI 756m northwest</li> </ul> <p>There are six non-statutory designated areas surrounding the site (within 2km), which contain semi-improved grassland types, semi-natural broad-leaved woodland, flushes and a stream. A North Wales Wildlife Trust Nature Reserve, Minera Quarry, is 798m away from the east of the site and partly covered as a SSSI. There are four areas of ancient semi-natural woodland within 2km of the site.</p> <p>The ecological survey produced by Marches Ecology showed habitat loss will be limited to the pods, footpaths, car park and vehicle access built on site and therefore have minimal impact on the surrounding habitat. There will be loss of some existing trees on site, but the development plans a long-term regeneration of native broad-leaved woodland. This will positively impact the biodiversity on and off site once the habitats are established.</p>	<p>No</p> <p>Project design mitigates any effects on designated and sensitive areas, with plans to improve the habitat value of the site through regeneration. Plans are also in line with Denbighshire council LDP policies regarding SAC and SSSI: VOE 1 key areas of importance and VOE 5 conservation of natural resources. Therefore, it is unlikely the development will have a significant effect on designated or sensitive sites.</p>
<p>Could any protected, important, or sensitive species of flora or fauna which use areas on/surrounding the site be affected?</p>	<p>No</p> <p>The ecological survey identified no plant species listed under Schedule 9 of the Wildlife and Countryside Act 1981 on site.</p>	<p>No</p> <p>Plans for restoration/improvements of the woodland for the short-, medium- and long-term have been created in a landscape strategy, which includes:</p>

	<p>The survey found no evidence of Badgers on site and deemed the habitat low quality for badger activity. For bats, the trees on site are not a sufficient size or age to support roosting. Habitat on and surrounding the site has potentially high value for community and foraging. Additionally, some bat roosts have been previously recorded within 2km of the site. The habitat is unlikely to be of value for otters and water voles beyond the watercourse on site that they use when moving. For great crested newts, ponds near to the site have high potential, but no evidence was found during eDNA survey. One grass snake was found on site, but no other reptiles were recorded. 18 bird species were recorded during the survey that could potentially nest on site, but only a small number of wood pigeon and crow nests were recorded.</p> <p>The site itself has limited potential for protected species, but there is little evidence of current use. It is therefore unlikely the project will affect any ecologically sensitive species. The surrounding 2km area has high habitat value for some sensitive species, but it is unlikely the project will impact this habitat given the regeneration efforts that have been included in the project to improve the local habitat.</p>	<ul style="list-style-type: none"> <li>- Broadleaf woodland planting</li> <li>- Natural regeneration broadleaf woodland, through seedbanks in the soil</li> <li>- Wet woodland areas to be retained and expanded</li> <li>- Scrub to site edge</li> </ul>
<b>Landscape and visual</b>		
<p>Are there areas or features on/surrounding the site which are protected for their landscape and scenic value, or non-designated features of high scenic value which could be affected by the project?</p>	<p>Yes</p> <p>The site is in the Clwydian Range and Dee Valley area of outstanding natural beauty (AONB). The designation is in place to conserve the natural beauty of the area and maintain the area's tranquillity and wildness.</p>	<p>No</p> <p>Due to location within the AONB, the design has sought to minimise the visual impact of the project and over time would improve the landscape through regeneration of native woodland and promotion of habitat for native species. The project is set to have a positive impact on</p>

	<p>The project will ultimately alter the landscape, mainly through tree clearing for construction. A landscape and visual assessment found that this effect will be temporary and range from small to medium in impact depending on the viewpoint to the site. Other impacts include construction works associated with contractor parking, plant and equipment, ground works for site levelling and installation of new drainage routes.</p> <p>The design attempts to minimise visual impact and landscape changes, which is especially important due to the AONB designation. Capping the height of the pods at 5.5m will avoid intruding upon views. Additionally, the pods are to be sited within the existing site contours to minimise the ground modelling required. A 5m buffer of green infrastructure will be installed to prevent the project disrupting views from the surrounding areas due to site visibility. This means the visual impact will change over time as this green infrastructure grows. Any flora introduced on site will be more natural to the landscape than the coniferous trees that are to be removed. This provides potential landscape benefits over the long term.</p>	<p>the landscape in the long term, and any negative impacts will be temporary.</p>
<p>Is the project in a highly visible location to many people?</p>	<p>No</p> <p>The nearest residential property is over 300m away and screened by woodland so the development would not affect a large number of local residents. The landscape and visual impact assessment identified six viewpoints of the site that will potentially be altered by the project. These viewpoints are mostly along public rights of way through the forest, with one next to the A525. The viewpoints have a low number of viewers and low to medium values of views. The</p>	<p>No</p> <p>There are a low number of people who will see the site who are not specifically attending the Oneplanet Adventure site. The project also includes a 5m buffer of green infrastructure to shield the site and prevent any viewpoints being altered.</p>

	majority of people who will see the site will be visitors to the mountain biking centre and lodge guests.	
<b>Cultural heritage/archaeology</b>		
Are there any areas or features protected for their cultural heritage or archaeological value which could be affected by the project?	<p>No</p> <p>Beyond the AONB cultural value, the area is mostly commercial timber production.</p> <p>There are no listed buildings or scheduled monuments on site. There are two designated historic assets in the local area: Maes Maelor Round Barrow and Cas-Gan-Ditw Round Barrow, which are located around 500m from the site, with no intervisibility due to intervening topography, and will not be affected by the proposed development.</p>	No
<b>Transport and access</b>		
Are there any routes on/surrounding the site which are used by the public for access to recreation or other facilities which could be affected by the project?	<p>Yes</p> <p>There are several footpaths and public rights of way surrounding the site, running along the northeast and southwest of the site. The paths are used for walking and biking through the Llandegla forest.</p>	<p>No</p> <p>Routes on and surrounding the site are within Llandegla Forest are used and maintained by the applicant and this use will continue alongside the proposed development.</p>
Are there any transport routes on or around the location which are susceptible to congestion, or which cause environmental problems, which would be affected by the project?	<p>Yes</p> <p>The access road for the existing OnePlanet adventure visitor centre lies to the north of the site. This road is connected to the A525. Vehicular access for the new development will also be at the north of the site, extending from the access road. The access road also contains a passing point to ease traffic.</p> <p>A transport statement produced for the project found that traffic conditions currently operate with no issues of congestion, delays, or safety concerns. The statement also</p>	<p>No</p> <p>It has been deemed unlikely that the project will increase congestion along the access road, and plans retain passing points to maintain the current operation of the road. It is therefore unlikely that this project will increase congestion or contribute to related environmental issues.</p>

	concluded that the new development will not increase traffic to the area, as guests in the lodges are existing visitors now choosing to stay overnight.	
<b>Land use</b>		
Are there existing land uses or community facilities on/surrounding the site which could be affected by the project?	No  The only nearby facilities are owned and operated by the client or in use as commercial forestry and water treatment. These uses will be unaffected by the proposed development.	No
Are there any plans for future land uses on/surrounding the location which could be affected by the project?	No  The surrounding area is expected to continue with its current use a commercial forest and mountain biking centre for the foreseeable future.	No
<b>Land stability and climate</b>		
Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme climatic conditions which could cause the project to present environmental problems?	No  The site has some sloping ground and a fault line running through it, but this has not been identified as a significant risk by the project consultants.	No

### Summary

It is not considered that an EIA is required on the basis of potentially significant effects. Mitigation measures embedded into the design have been taken into account in the following areas:

- Phosphate loading and wastewater treatment
- Landscape and visual impacts within the AONB
- Biodiversity enhancements

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# Planning Statement

## Appendix B: Pre-Application Enquiry Report

### Llandegla Forest Holiday Lodges

On behalf of Oneplanet Adventure Ltd

August 2022

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Pre-Application advice enquiry to  
Denbighshire County Council for  
24 Nr Visitor Accommodation Lodges  
and associated works in connection with  
Coed Llandegla Forest Visitor Centre  
for  
Oneplanet Adventure Ltd



Adrian Jones Associates

RIBA 

Chartered Practice

February 2022

Document Reference AJA 21910 Pre-app issue 1

## 1.0 Introduction

Oneplanet Adventure operate UK's leading Forest Visitor Centre. Located in Coed Llandegla, in the Clywdian Hills and Dee Valley Area of Outstanding Natural Beauty, it attracts 160,000 visitors a year to use its mountain biking, running and walking trails. Opened in 2006 the Centre now provides parking for about 300 cars, a cafe, bike shop with hire and workshop facilities. Ten full time staff and sixteen part time staff are employed on the site.

The development will provide all year around overnight self-contained visitor accommodation in up to 24 prefabricated single storey timber lodges for users of the Centre. The objective is to increase customer dwell time and the revenue generated per visitor. These objectives accord with Denbighshire County Council's desired outcomes as set out in their Tourism Strategy 2019 -2022<sup>1</sup>. The development once completed will provide employment for two full time members of staff.

Oneplanet Adventure have been recognised for their commitment to sustainable tourism<sup>2</sup> and the sustainability of the proposed scheme is an important aspect of the development.

## 2.0 Site Description

2.1 Coed Llandegla extends to approximately 650 Ha of predominately commercially planted coniferous trees situated south of the A525 between the villages of Llandegla, some 3Km to the west, and Bwlchgwyn, some 6Km to the east. The site for the proposed lodge development is on the northern edge of the forest and extends to 0.91Ha. The site is bounded to the north by an unclassified single track road, with passing places, that links the A525 with the B5430 at Gwynfryn and provides access to the Visitor Centre. The western boundary is defined by a small watercourse and chain link fencing to a Water Treatment Plant. Eastern and southern boundaries are not defined by existing linear features.

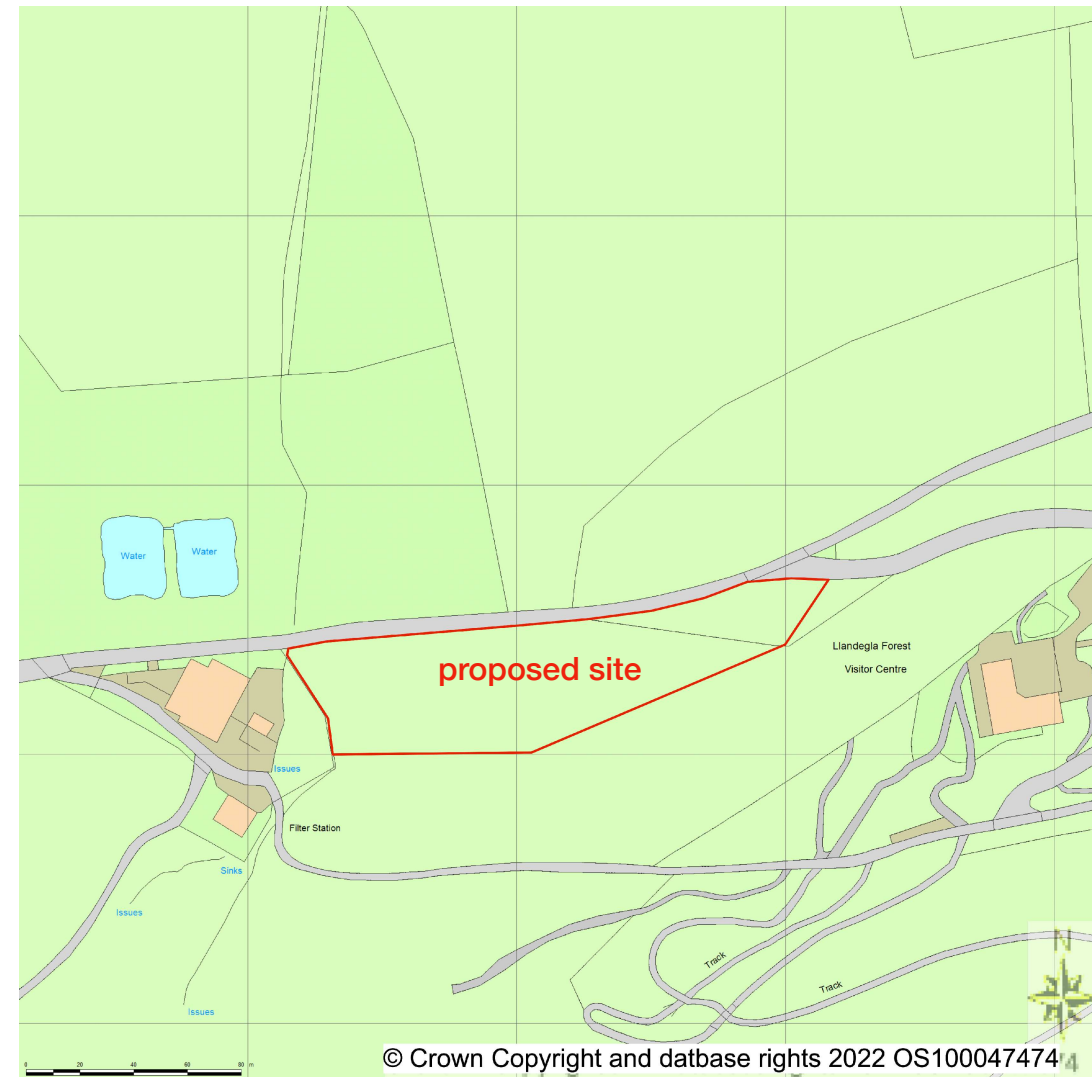


Figure 1. Site Location Plan

<sup>1</sup> Denbighshire County Council Tourism Strategy 2019 -2022 ,p4

<sup>2</sup> David Scruton Award 2015

- 2.2 The site roughly tapers in shape, with a frontage of 190m along the road and a depth of about 60 m at its western end and 20m at its eastern end. See *Figure 3* for the existing site survey.
- 2.3 The northern boundary rises in elevation<sup>3</sup> from 332 m at its western edge to 339m at its eastern end. The western boundary rises from 332m to 337m and the eastern boundary from 339 to 342m. Beyond the southern boundary the land then begins to rise very steeply to above 400m. The Visitor Centre floor is at an elevation of 355.71m.
- 2.4 The watercourse on the western boundary feeds into the Nant y Fridd Reservoir. Two ditches cross the site running east to west and a small area of marsh has formed adjacent to road on the western boundary. Small areas of the site adjacent to the watercourse and parts of the ditch system have been identified in the Flood Risk Assessment Map for Wales as at Low Risk of flooding from surface water and small water courses.
- 2.5 Tree planting on the site appears to have been done in the early 1970s as one block and there is little age or species diversity in the main canopy. The planted trees are ready for commercial felling. Some native species of trees, shrubs, vegetation and grasses are growing along the periphery of the site and where trees have been blown over or felled. Mosses are well established on the forest floor.
- 2.6 Land use adjacent to the site is either forestry or poorly drained rough grazing and moorland.
- 2.7 The Ruabon and Llantysilio Mountain & Minera Site of Special Scientific Interest (SSSI) boundary runs approximately 0.6Km to the southeast of the site and the Llandegla Moor SSSI boundary 1.0Km to the northwest. The Unified Peat Map Wales shows shows a surface peat layer about 0.1Km to the north of the site.
- 2.8 There are no Listed buildings within 0.5Km of the site. A Scheduled Monument, the Casgan-Ditw Round Barrow, sits about 0.5Km to the north west of the site. The road running along the northern boundary is noted by the Clwyd Powys Archaeology Trust as a possible route of a Roman Road or Medieval Trackway.

<sup>3</sup> Elevation levels are all given above Ordnance Survey Datum

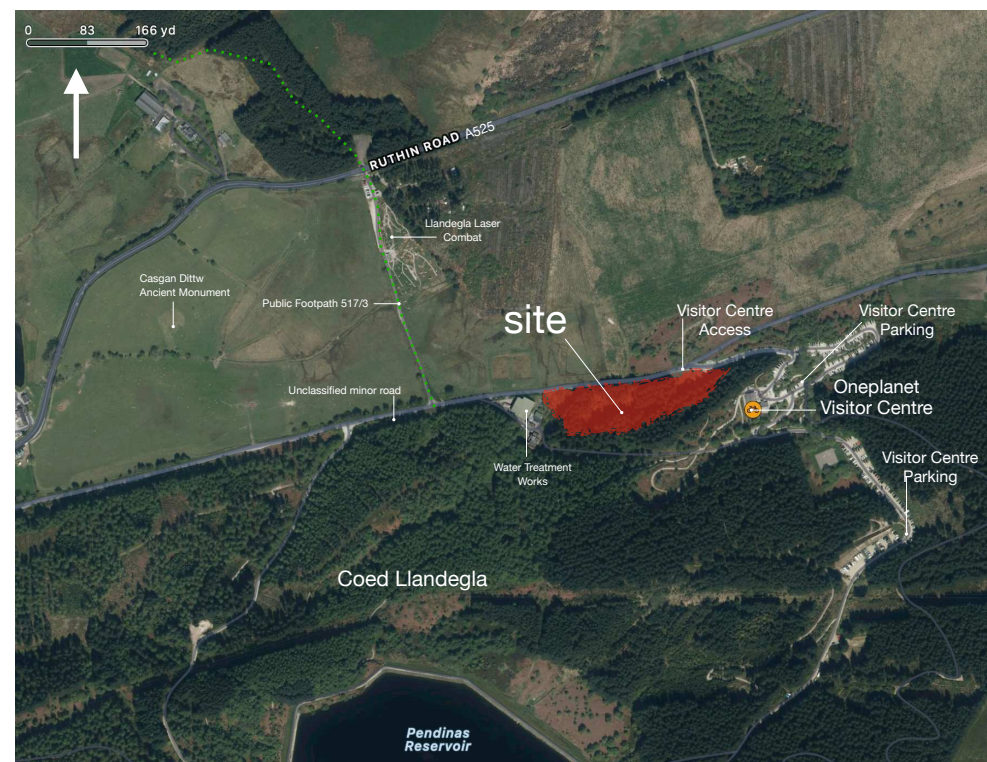


Figure 2. Aerial Photograph of site

2.9 The Landmap Designation Summary for Coed Llandegla is:  
*'An extensive and uniform conifer woodland plantation of little interest but providing access along tracks to Pendinas Reservoir which is a small open water body to the east. Long distance footpath Offas Dyke also runs across the area. Views are highly limited by the dominant and enclosed vegetation, with little available views out to the surrounding countryside. Recent pockets of forest have been cleared but these are not widely apparent'.*

2.10 The Landmap Recommendations for Coed Llandegla are:  
*Conifers dominant and possibly a little oppressive but improves and is more open near top of hill. Would benefit from opening up of glades and viewpoints out of area and diversification of plantation edge with more broadleaf native species where possible;*  
*Enhance and diversify the forest cover and create more glades;*  
*Diversify species especially at plantation edge with broadleaf native species.*

2.11 Views of the site from the A525 running 0.35Km to the north of the site are well filtered or screened by emerging woodland. The site will be visible in part from Public Footpath ( Nr 517/3) 0.16Km to the west. Views of the site from the Public Footpaths (Nr 517/3/4/31) on Moel Garregog will be possible in places. In all cases the site will be seen against the rising and dominant backdrop of the forest beyond.

### 3.0 The Proposals

3.1 The intention is to provide up to 24 prefabricated self-contained accommodation lodges comprising a mix of 2 person and 4 person units each with a secure bike store and external decking sitting area. Each unit will have a small kitchen and shower room. One unit will be designed to be accessible to all. The indicative type of unit proposed is shown in *plate 3*. It is anticipated that the total gross floor area of the pods will be about 800m<sup>2</sup> together with a support services building of about 60m<sup>2</sup>. An indicative layout for the site is shown in *Figure 4*.

3.2 This layout has been generated by adopting the following design principles:

3.2.1 The site is north facing and orientating the units east or west will maximise the amount of direct sunshine on the sitting out areas in the evening or morning when guests are most likely to be present. This orientation will also generally respect the existing site contours and reduce the amount of earth moving required to provide a level base for the units without the need for creating significant raised platforms or retaining structures. Sitting out areas are arranged to avoid direct overlooking from adjacent units.

3.2.2 Units will be separated from each other by a distance of 6m to provide a degree of privacy and also fire separation<sup>4</sup> between units. All units will be within a 45m from a hardstanding for emergency vehicles or service goods vehicles (see *Figure 5*). The units will be linked by a hierarchy of paths from the parking area /service building and Visitor Centre. Paths will be permeably paved and informal in character and follow routes that will relate to the contours and retained features of the site.

3.2.3 Parking will be provided on site for 26 cars, including 1 disabled parking space, and secure storage for 72 bicycles. Due to the steepness of the terrain dispersing car parking throughout the site would require significant ground disturbance and a subsequent loss of the woodland/ rural character. Parking is therefore proposed in two separated landscaped parking areas to avoid the need for larger centralised parking. Additional parking will be available in the existing visitor centre and linked by a new footpath. Surfaces in the parking areas will be permeable with timber edging providing an informal rural appearance.

3.2.4 A new vehicular access is proposed onto the highway as shown on the indicative layout. The highway appears to be subject to the national speed limit which would require a 2.4m x 215m visibility splay for the access. A visibility splay of about 2.4 x 180+m appears achievable to the west of the proposed access and 2.4m x 120m to

<sup>4</sup> Model Standards for Caravans 1983/89 require 5-6 m separation between units.

the east. The highway is mostly used for access to the Visitors Centre.

- 3.2.5 A turning space can be provided on the site for service vehicles, fire appliances and recycling collection lorries. (See *Figure 5*) Recycling bins will be centralised in the service building and will be screened or enclosed.
- 3.2.6 There is no public transport serving the site.
- 3.3 The landscaping strategy assumes selected felling of the existing trees while retaining some suitable specimens to form a framework to which the new planting scheme of native broadleaf trees can relate. Retained trees may require support from anchoring systems. Landscaping will aim to be low maintenance with a natural woodland glade character providing a variety of habitat enhancements including a pond/ reed bed. The development will be situated well below the skyline of high ground to the south of the site. A detailed landscaping and bio-diversity scheme would be included in any planning application.
- 3.4 The proposed lodge units will have a low carbon footprint using FSC certified timber for the structure and cladding. Low energy fittings and lighting will be used. The aim is to provide the majority of the site's energy needs from renewable technology using PV solar panels mounted on the Visitor Centre roof in conjunction with battery storage. Site generated electrical distribution will be below ground.
- 3.5 An on-site below ground packaged sewage plant will be provided in conjunction with a reed bed installation with discharge to the watercourse - subject to the necessary consents.
- 3.6 The development will require approval by the Sustainable Drainage Approving Body (SAB). The majority of hard surfaces will be permeable and the existing water courses on site will be utilised for surface water drainage.
- 3.7 All external lighting used on the development will be of the low spill type to support the 'Dark Skies' strategy of the AONB and to mitigate disturbance to wildlife.



Plate 1 View along northern boundary site towards the west



Plate 2. Looking west within the site

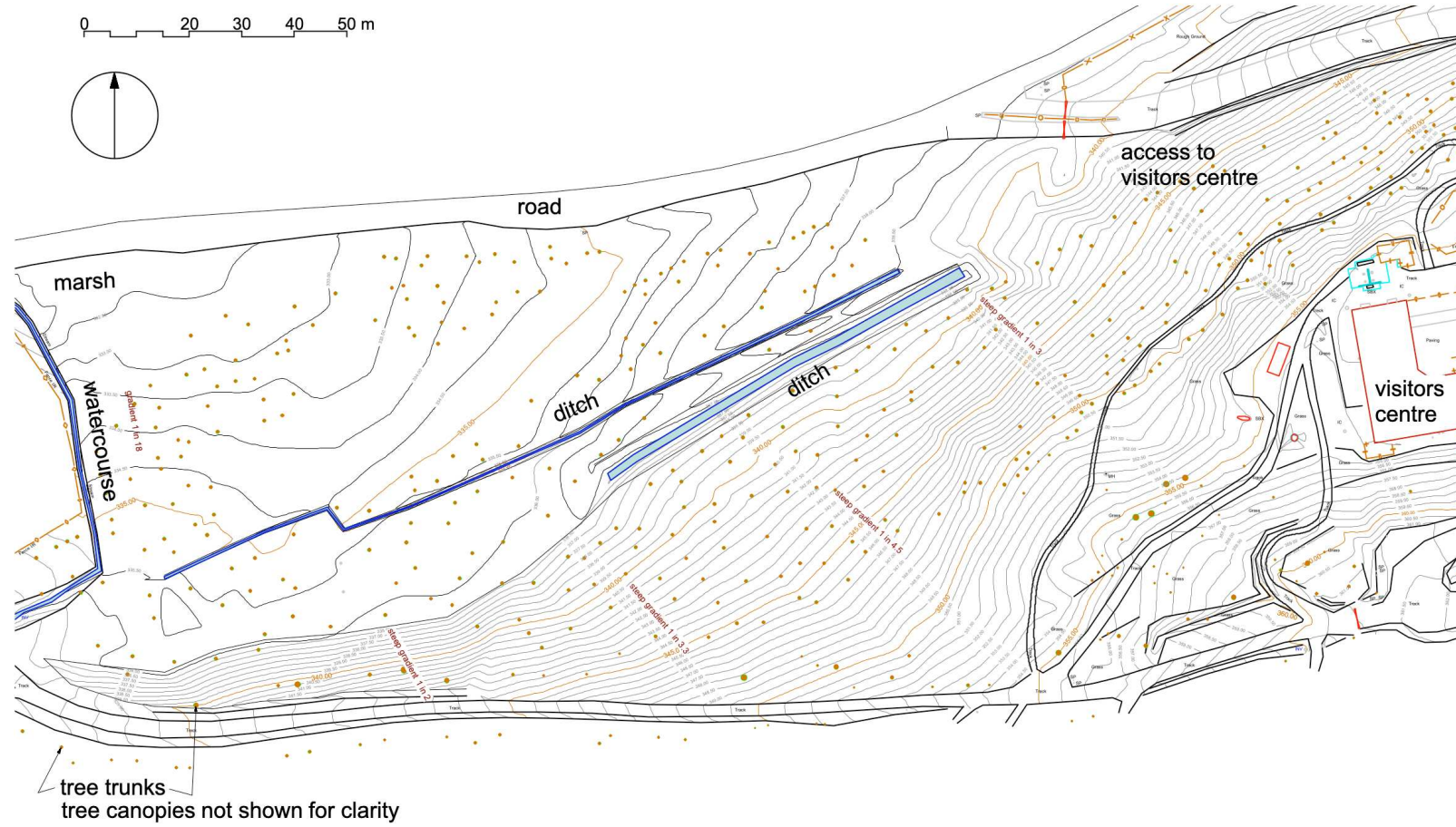
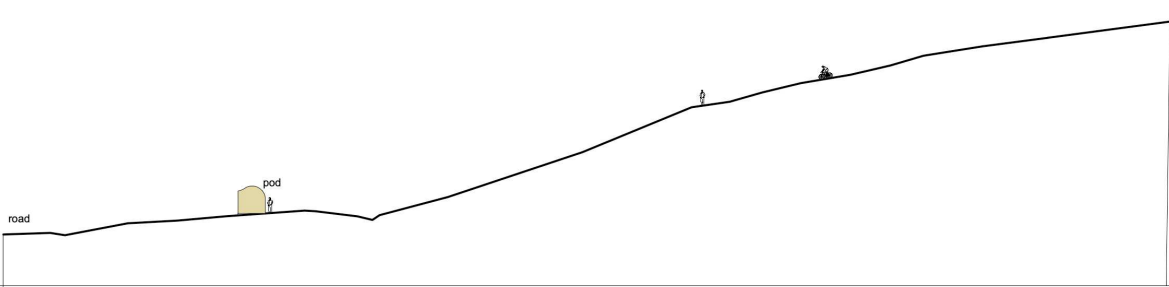
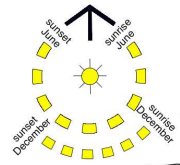
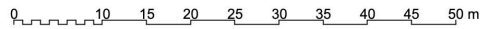


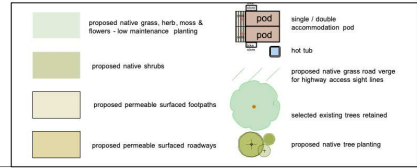
Figure 3 Existing Site Survey



Indicative Section X-X

- Proposed Accommodation**  
 12 two person pod units  
 12 four person pod units  
 including 1 accessible unit  
 parking for 26 cars including 1 disabled space  
 1 reception/ service/ housekeeping building  
 bike wash facility  
 2 bike security store for each pod

Site Area 0.91Ha Approx



revision A: New 12 Double Pods 12 Single Pods  
 - Secure Site store for each unit  
 - Hot tubs shown

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project: **Holiday Lodges Llandegla**

title: **Schematic Site Plan as Proposed**

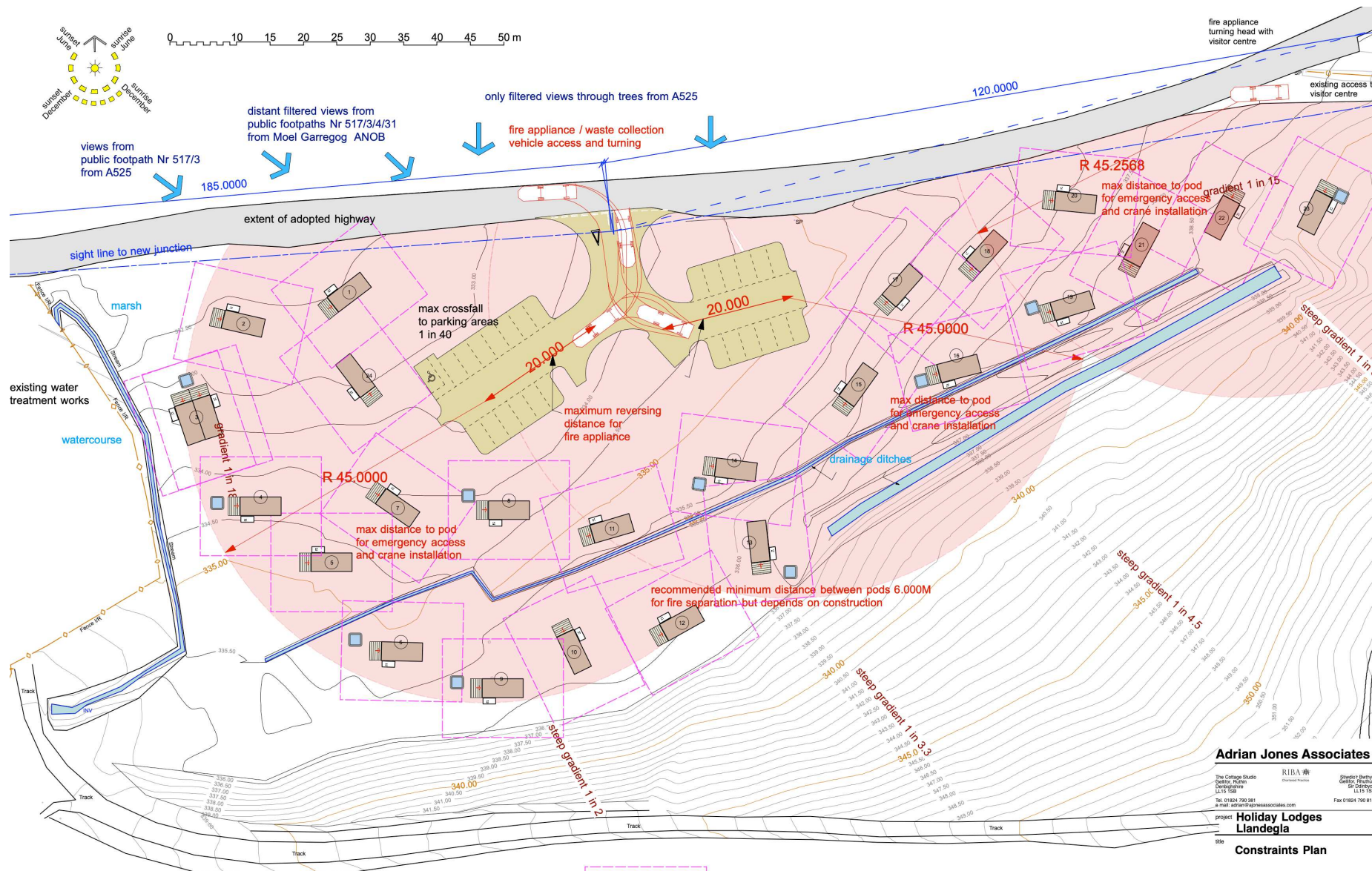
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scale: **1:500 @ A3** date: August 2019

drawing no: **AL(sk)02** revision: A

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site:

**Constraints Plan**

status: preliminary	job no: 21910
scale: 1:500 @ A3	date: January 2022
drawing no: AL(sk)01	revision:
drawn: rj	checked:

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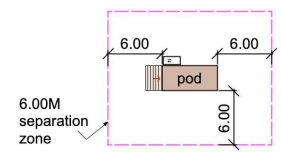
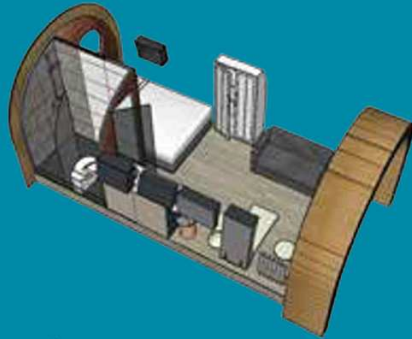


Figure 5 Site Constraints



**Size**  
6m (19ft 8in) x 3m (9ft 10in)



Plate 3 Typical Pod by Quality Pods Wales ©



## 5.0 Planning Polices

5.1 Planning Policies in Denbighshire County Council Local Development Plan considered most relevant to this development have been identified below and our comments as how these will be addressed in the development are highlighted in blue.

### **Policy PSE 5 - Rural Economy**

*In order to help to sustain the rural economy, tourism and commercial development, including agricultural diversification, will be supported throughout the County subject to detailed criteria, which include making a significant contribution to sustainable development and recognising the special status of the Area of Outstanding Natural Beauty/Area of Outstanding Beauty.*

*Appropriate employment proposals for both conversions and new build outside of development boundaries will be supported provided the following criteria are met:*

- i) *the proposal is appropriate in scale and nature to its location;*  
**The scale of the development is small and respects its surroundings See items 3.2.2 to 3.2.5.**
- ii) *any suitable existing buildings are converted or re-used in preference to new build;* **There are no suitable buildings available at the existing business premises or on the proposed site.**  
*and*
- iii) *proposals for new buildings are supported by an appropriate business case which demonstrates that it will support the local economy to help sustain local rural communities;*  
**This will be provided as part of any planning application**  
*and*
- iv) *within the AONB/AOB, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas, take full account of and seek to enhance the nature and distinctive qualities of the local landscape. In line with national policy any proposals that are considered to be detrimental to the quality of the AONB and World Heritage Site will be refused.*

**The landscaping strategy accords with the Landmap Recommendations to improve the quality of the existing landscape of this area.**

### **Policy PSE 14 – Outdoor activity tourism**

*Development proposals that expand or reinforce the tourism offer of the County in the outdoor activity sector will be supported provided the following criteria are met:*

- i) *the development is appropriate to its setting and within the capacity of the local environment and infrastructure, particularly within and adjoining the Area of Outstanding Natural Beauty, Area of Outstanding Beauty, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas. In line with national policy any proposals that are considered to be detrimental to the quality of the Area of Outstanding Natural Beauty and World Heritage will be refused; a*

**The scale of the development is small and respects its surroundings See items 3.2.2 to 3.2.5.**

*and*

- ii) *that any suitable existing buildings are converted or re-used in preference to new build;* **There are no suitable buildings available at the existing business premises or on the site**
- iii) *necessary mitigation measures are included and the proposals would not have an unacceptable impact on the local community; and*  
**Landscaping will be an integral part of the development and there no residential properties within 350 m of the site**
- iv) *chalet development in association with outdoor activity tourism will only be permitted if a significant need is demonstrated and there are no opportunities to use or convert existing buildings for tourist accommodation.*

**The Council's Tourism Strategy 2019 -2022 recognises that 'We have a limited number of places for tourists to stay overnight, so that the ambition for events and attractions is limited by the number of people who are able to stay locally.'**  
**There are no suitable buildings available on the site of the existing business.**

### **Policy ASA 3 – Parking standards**

*Development proposals, including changes of use, will be expected to provide appropriate parking spaces for cars and bicycles. If the use of a property or premises requires parking infrastructure for mobility impaired people, these facilities will be taken into account when determining the amount of parking space required. Consideration will be given to the following circumstances (where they apply) in determining parking provision:*

- *The site is located within a high-densely populated area;*
- *Access to and availability of public transport is secured;*
- *Parking is available within reasonable distance of the site;*
- *Alternative forms of transport are available in the area.*

**Standards set out in the Supplementary Planning Guide for Parking do not specifically refer to chalet type accommodation. The standard for hotel refers to 1 parking space per bedroom and 1 space per 3 non residential staff. This would equate to 36 spaces for guests and 1 space for staff. The proposal is to provide 1 space per unit on site for guests - 24 in total (including 1 disabled) and 2 spaces on site for staff. Overflow parking would be provided at the Visitor Centre car park linked to the new site by a new footpath. Secure parking for 72 bicycles would be provided on site.**

### **Policy RD5 The Welsh Language & the Social and Cultural Fabric of Communities**

**The floor area of the development will be less than 1000m<sup>2</sup> below the trigger for requiring Community Logistic Statement**

### **Supplementary Planning Guide. - Caravans, Chalets and Camping**

**The guide has been used to inform the development of he proposals in particular section 7 ‘Development Proposals’.**

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# Planning Statement

## Appendix C: Pre-App Enquiry Response

### Llandegla Forest Holiday Lodges

On behalf of Oneplanet Adventure Ltd

August 2022

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Eich cyf / Your ref

Ein cyf / Our ref : 17/2022/0172

Dyddiad / Date : 24 March 2022

Rhif union / Direct dial : 01824 706727



Mr Adrian Jones  
Adrian Jones Associates  
The Cottage Studio  
Gellifor  
Rhuthun  
Denbighshire  
LL15 1SB

Dear Sir / Madam

**Town and Country Planning Act 1990**  
**Town and Country Planning (Development Management Procedure) (Wales) Order 2012**

**CAIS /** 17/2022/0172  
**APPLICATION:**

**CYNNIG /** Enquiry for 24 No Visitor Accommodation Lodges and associates works in  
**PROPOSAL:** connection with Coed Llandegla Visitor Centre

**LLEOLIAD /** Land adjacent to Visitor Centre Coed Llandegla , Llandegla, Wrexham  
**LOCATION:**

I am writing in response to your pre-application enquiry dated 23<sup>rd</sup> February 2022.

### **Planning history of the site**

There is no planning history pertaining to the enquiry site itself, however, for the centre as a whole, the following planning history is relevant:

- 17/2002/0990 Development of mountain bike centre including construction of visitor centre, parking area, construction of new vehicular access and passing bays. GRANTED 25/06/2003.
- 17/2004/1090 Details of mountain bike centre building and associated pedestrian access, landscaping and foul drainage arrangements, submitted in accordance with condition number 4 of planning permission code no. 17/2002/0990/PF. GRANTED 26/07/2005.
- 17/2005/0410 Variation of Condition 8(g) of planning permission for Mountain Bike Centre, to provide for a combination of signage and entrance road construction detail to discourage access along Old Roman Road from B5430, in preference to Road Traffic Order. GRANTED 25/05/2005.

- 17/2005/0553 Details of access track and car park layout. passing bays, junction improvements, and routing of construction vehicles. travel arrangements for large events, monitoring of use of car park, centre and approach road, and links with other cycle routes. and habitat enhancement submitted in accordance with condition numbers 8,12,19 & 22 of planning permission code no. 17/2002/0990/PF. GRANTED 28/06/2005.
- 17/2005/1276 Details of oil interceptor arrangements, safety fencing at crossing points with footpaths, and arrangements for monitoring of car parking and traffic movement submitted in accordance with condition numbers 10,15 and 19(b) of planning permission code no. 17/2002/0990/PF and condition 1 of code no. 17/2005/0410/PS. GRANTED 30/11/2005.
- 17/2006/1340 Details of planting, car park use surveys and height restriction barriers in connection with extension to car park submitted in accordance with condition no's 3,7 and 8 of planning permission code no. 17/2006/0427/P. GRANTED 21/11/2006.
- 17/2006/0427 Use of land as overspill car park and access road. GRANTED 27/06/2006.
- 17/2006/0673 Extension of temporary consent for Variation to Condition 8(g) of planning permission for Mountain Bike Centre, to provide for a combination of signage and entrance construction detail to discourage access along Old Roman Road from B5430, in preference to Road Traffic Order (previous consent granted under code no. 17/2005/0410/PS, to 30th June 2006). GRANTED 28/07/2006.
- 17/2006/1358 Variation of Condition 2 of planning permission code no. 17/2002/0990/PF relating to hours of opening of mountain bike centre building, car parks, and bike trails, to permit. Standard opening hours. Visitor centre 0800 - 2000 each day Car park 0800 - 2030 each day Variations to the above. a) Visitor Centre and Car Park to remain open until 2200 hours each Wednesday. 2200 hours each Saturday between 1st May and 30th September b) Visitor Centre and car park to open at. 0500 hours 1st April - 31 May each year. GRANTED 24/01/2007.
- 17/2007/1008 Proposed variation of condition 8(g) of planning permission for Mountain Bike Centre, to approve existing arrangements for means of discouraging access along Old Roman Road from B5430 in preference to Road Traffic Order (combination of signage and entrance construction detail). GRANTED 20/09/2007.
- 17/2008/0373 Erection of extensions to visitor centre to provide classroom and administration offices, cycle workshop, store, dining terrace, food preparation and store. and re-routing of bike trails. GRANTED 11/06/2008.
- 17/2013/0467 Variation of Condition No. 1 on planning permission Code No. 17/2008/0373/PF to increase time for commencement of work by 3 years (extensions to visitor centre to provide classroom and administration offices, cycle workshop, store, dining terrace, food preparation and store. and re-routing of bike trails). GRANTED 30/07/2013.
- 17/2021/0074 Siting of an office accommodation building to be used in conjunction with the existing use of the site. GRANTED 24/03/2021.
- 17/2021/0341 Provision for roosting bats and nesting birds submitted in accordance with condition no. 6 of planning permission code no. 17/2021/0074. GRANTED 20/05/2021.

## **Planning policy context**

All planning applications are assessed against the policies contained in the adopted Denbighshire Local Development Plan (LDP) and in the guidance contained in relevant Supplementary Planning Guidance Notes (SPGs), together with national planning policy and guidance set out in Welsh Government's Planning Policy Wales Edition 11 (PPW 11 - February 2021) Future Wales – The National Plan 2040 and Technical Advice Notes (TANs).

The site is located in the open countryside. The site is also located within the Area of Outstanding Natural Beauty (AONB). The area is designated as being a Mineral Safeguarded Area (for sand and gravel). The area is within a Phosphate Sensitive SAC Catchment Area relating to the River Dee. Also of note, the site is within a groundwater vulnerability area and a nitrate vulnerable zone.

The relevant LDP planning policies that would be applicable for a tourism accommodation proposal in this location are as follows:

- Policy RD5** – The Welsh language and the social and cultural fabric of communities
- Policy PSE5** – Rural economy
- Policy PSE12** – Chalet, static and touring caravan and camping sites
- Policy PSE14** – Outdoor activity tourism
- Policy PSE15** – Safeguarding minerals
- Policy PSE16** – Mineral buffer zones
- Policy VOE1** - Key areas of importance
- Policy VOE2** – Area of Outstanding Natural Beauty and Area of Outstanding Beauty
- Policy VOE5** – Conservation of natural resources
- Policy VOE6** – Water management
- Policy ASA3** – Parking standards

The Council has adopted a suite of Supplementary Planning Guidance Notes (SPGs) which amplify development plan policies and provide further information and guidance to developers. The following SPGs would apply to a tourism accommodation proposal in this location:-

- Supplementary Planning Guidance Note: Access For All
- Supplementary Planning Guidance Note: Archaeology
- Supplementary Planning Guidance Note: Clwydian Range and Dee Valley Area of Outstanding Natural Beauty
- Supplementary Planning Guidance Note: Planning for Dark Skies – SPG for lighting in the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty
- Supplementary Planning Guidance Note: Conservation and Enhancement of Biodiversity
- Supplementary Planning Guidance Note: Parking Requirements In New Developments
- Supplementary Planning Guidance Note: Planning and the Welsh language
- Supplementary Planning Guidance Note: Caravans, Chalets & Camping
- Supplementary Planning Guidance Note: Trees & Landscaping

In terms of national planning policy Planning Policy Wales, Edition 11 (PPW 11) and Technical Advice Notes (TAN) 5, 6, 12, 13, 18 and 23 are considered to be of particular relevance to the proposal.

- TAN 5 Nature Conservation and Planning (2009)
- TAN 6 Planning for Sustainable Rural Communities (2010)

TAN 12 Design (2016)  
TAN 13 Tourism (1997)  
TAN 18 Transport (2007)  
TAN 23 Economic Development (2014)

### **Principle of development**

The site is located outside of any development boundaries as defined by the Local Development Plan and is therefore referred to as being in open countryside. In addition, the application site forms part of the Area of Outstanding Natural Beauty (AONB) which means the site is highly sensitive in terms of its setting.

The proposal is for 24 timber lodges for users of Llandegla mountain bike centre which is operated by Oneplanet Adventure. The lodges are proposed to the northern edge of Coed Llandegla in an area extending to 0.91ha. The majority of trees on site are for commercial felling although there are some native species, shrubs and vegetation along the periphery of the site.

The proposed lodges are for 2 and 4 persons each having a bike store, small kitchen and shower room. One lodge will be designated as an accessible lodge to house less able bodied individuals. They are to be built using FSC certified timber with low energy fittings, with electricity provided by the PV solar panels mounted on the Visitor Centre roof in conjunction with battery storage. Site generated electrical distribution is to be below ground and a ground packaged sewage plant is planned with a reed bed. External lighting is to be of low spill to support the Dark Skies strategy of the AONB and mitigate disturbance to wildlife.

PPW Edition 11 supports tourism in rural areas where it provides a healthy and diverse economy. Development should be sympathetic in nature and scale to the local environment. Tourism is encouraged where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion.

Denbighshire County Council has declared a climate change emergency and has amended its principals of decision making in the Council's Constitution. Planning decisions must therefore be considered having regard to tackling climate and ecological change as well as the sustainable development principles and the well-being of future generations. Planning applications should therefore highlight their climate and ecological credentials.

Denbighshire Local Development Plan 2006 – 2021 (LDP) applies namely policies PSE 5 Rural Economy and PSE 14 outdoor activity tourism. Policy PSE 14 and PSE 5 outline the general intent of the LDP to help sustain the rural economy, through the support of tourism and commercial development, subject to detailed criteria relating to the character and distinctive qualities of the local landscape. Policy PSE 14 is considered to be of most relevance as the proposal would be directly related to the mountain bike centre. Policy PSE 14 states that:-

*'Development proposals that expand or reinforce the tourism offer of the County in the outdoor activity sector will be supported provided the following criteria are met:*

- i) the development is appropriate to its setting and within the capacity of the local environment and infrastructure, particularly within and adjoining the Area of Outstanding Natural Beauty, Area of Outstanding Beauty, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas. In line with national policy any proposals that are considered to be detrimental to the quality of the Area of Outstanding Natural Beauty and World Heritage will be refused; and*
- ii) that any suitable existing buildings are converted or re-used in preference to new build; and*

*iii) necessary mitigation measures are included and the proposals would not have an unacceptable impact on the local community; and  
iv) chalet development in association with outdoor activity tourism will only be permitted if a significant need is demonstrated and there are no opportunities to use or convert existing buildings for tourist accommodation'.*

The justification text goes on to state that *'Denbighshire is well placed to take advantage of the growth in the outdoor activities sector. The success of current facilities such as the Llandegla Mountain Bike Centre should be built upon and encouraged. Expenditure by participants in outdoor activities is often high and the County is supportive of developments that will encourage sustainable growth in this sector within environmental capacity limits.*

*Development proposals, particularly within the Area of Outstanding Natural Beauty or Area of Outstanding Beauty, will require very careful consideration to ensure there will be no detriment to the landscape character.*

*In line with policy PSE 12, new static caravan sites will not be permitted'.*

In principle therefore, it is considered that a form of accommodation connected to the mountain bike centre could be acceptable in this location subject to there being significant need demonstrated and that it is appropriate to its setting/capacity within the local environment and infrastructure. The submissions supporting documents confirm that there are no other suitable buildings that could be converted.

A planning application would need to be supported by a business case demonstrating the benefit of the lodges to the local rural economy and Coed Llandegla, such as details of the anticipated increase in overnight stays and revenue. Evidence of need for such accommodation should also be provided, particularly the availability of accommodation that caters to the needs of bikers providing washing down services and bike storage. The application should describe how it will enhance the nature and distinctive qualities of the AONB (Policy VOE 2) and provide details of the proposed lighting scheme.

In terms of the lodges if they are not to fall foul of Policy PSE 12 which would not allow new static caravan sites to be created (Chalet, static and touring caravan and camping sites) and avoid meeting the definition of a static caravan then they need to have some permanency. The proposed lodges are intended to have their own toilets, will be connected to a sewage system and have electricity provided from the Visitor Centre PVs. This in itself indicates some permanency but they should not be built on an adjustable timber base and should have a permanent footprint.

If the lodges have a permanent impact on the land then they will be assessed taking into account issues such as the site, its surroundings, layout, character, views, landscape, accessibility and natural environment. Cumulative impact and screening will also be considered. The layout of the lodges, i.e. the site however will be assessed using the Supplementary Planning Guidance 'Caravans Chalets and Camping'.

In terms of utility services it is noted that solar electricity has been considered and renewable energy technologies should also be considered for heating the lodges so that they can provide all year round accommodation. New utility services should be located far enough away from existing trees to prevent damage to the trees from installation and maintenance and to avert possible damage to the apparatus. Where possible, all utility apparatus should be ducted and laid "in corridors".

### **Other material considerations**

Notwithstanding the issues set out above with respect to the principle of the development, comments are provided below regarding other material considerations which would need to be addressed should an application be forthcoming:

### **Area of Outstanding Natural Beauty, Detailed Design, scale, layout, appearance and landscaping:**

The site is located within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB). A key requirement of both Policy PSE 14 and PSE 5 is that the development is appropriate to its setting and within the capacity of the local environment and infrastructure, particularly within and adjoining the AONB. In line with national policy, any proposals that are considered to be detrimental to the quality of the AONB will be refused.

Policy VOE 2 requires assessments of the impact of development within or affecting the AONB, and indicates that development should be resisted where it would cause unacceptable harm to the character and appearance of the landscape and the reasons for designation.

This reflects guidance in Planning Policy Wales 11 (PPW 11) which requires planning authorities to give great weight to conserving and enhancing the natural beauty of AONBs, and should have regard to the wildlife, cultural heritage and social and economic well-being of the areas. The special qualities of designated areas should be given weight in the development management process. Proposals in AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered.

Policy PSE5 and PSE 14 requires development to be appropriate in scale and nature to its location and to take full account of and seek to enhance the nature and distinctive qualities of the local landscape. The site is located within an area of commercial forest in an open countryside location. The main site with the mountain bike centre buildings and car parks are located further within the forest. Officers are of the opinion that this proposal is a significant scale within the AONB and that a Landscape and Visual Impact Assessment/ Statement should be submitted as part of any application alongside a detailed landscaping scheme that sets out how the units would be integrated into the site. Section 8 of the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) SPG details Key Design Considerations including scale and siting, design, materials, setting and landscaping to inform any design.

In addition, a tree survey would be required in order to inform and ensure that the trees shown to be retained wouldn't be impacted by the proposed development. This needs to consider the car park, paths, hut bases and drainage.

Small scale schemes can be found acceptable, however, the current proposals may not fully integrate the units into the site/ landscape. With the units being proposed directly adjacent to the highway on a site that has a rising topography; Officers do have some concerns over the density of the site and separation distances between units / potential to successfully screen and integrate the site. A wider landscape buffer may be required along the edge to integrate the site more effectively. Units 1, 2 and 20, the parking area and service building would likely be very visible from the wider area. In addition a number of the units such as 24, 3, 17, 18, 16, 15, 21, 22 are also reliant on new planting only. The landscaping scheme and statement would need to consider how these would be integrated and screened from the initial installation and managed over time.

The comments in the highway section of this statement, may provide more opportunity to use existing screening in the centre of the site.

The Caravans, Chalets & Camping SPG advises that new buildings will only be permitted on a site where they are necessary for the effective operation of the site. Their visual impact should be kept to a minimum through careful siting and design using the design principles used across the remainder of the site.

Officers consider a less dense site may be higher quality and more in keeping with the objectives of the AONB and allow the retention of more existing trees to help integrate and screen the site from installation. The tree survey and landscape assessment is going to be key in informing the design of this site.

The design of the pods appear to be in keeping and the AONB Joint Advisory Committee are supportive of the curved appearance. The AONB JAC advise the following;

*“This an elevated site and the Joint Committee recommends that a Landscape Assessment to be completed along with a Business Plan. The heavily wooded nature of much of the site significantly reduces the landscape impact of the development, and the committee would emphasise the need to ensure that the existing tree screen and woodland character of the site is maintained in the long term and supplemented by additional planting of locally native trees. To further reduce visual impact the committee would recommend that any new pods should be finished in recessive colours (e.g. timber finishes) with dark grey roofs. Further details of any external lighting are also required to ensure that the lighting scheme is designed to conserve the AONB’s dark skies”.*

Given that the site currently has no lighting within this area, it is considered that a lighting assessment/strategy informed by the Supplementary Planning Guidance Note: Planning for Dark Skies should be submitted with any application to protect the AONB and nature conservation. This should consider internal and external lighting required. The lighting scheme should include sufficient details to be able to assess measures incorporated to minimise light pollution including the colour temperature of proposed lighting units.

#### **Amenity considerations: Residential**

Local Development Plan Policy RD 1 test (i) requires due regard to issues of siting, layout, form, character, design, materials, aspect, microclimate and intensity of use of land / buildings and spaces between buildings, which are matters relevant to the visual impact of development; test (vi) requires that development does not unacceptably affect prominent public views into, out of, or across any settlement or area of open countryside; test (vi) requires the incorporation of existing landscape or other features, takes account of site contours, and changes in levels and prominent skylines; and test (xiii) requires the incorporation of suitable landscaping measures to protect and enhance development in its local context.

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The visual amenity and landscape impacts of development should therefore be regarded as a potential material consideration.

In terms of residential amenity, the nearest dwelling 350m away and therefore it is not considered that this use/site should cause an unacceptable impact upon their amenity.

### **Access / Highways and Parking:**

Planning Policy Wales 3.1.4 refers to what may be regarded as material considerations and that these can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment. The acceptability of means of access is therefore a standard test on most planning applications. Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. These policies reflect general principles set out in Planning Policy Wales (Section 8) and TAN 18 – Transport, in support of sustainable development.

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The highway impacts of development should therefore be regarded as a potential material consideration.

Local Development Plan Policy RD 1 supports development proposals subject to meeting tests (vii) and (viii) which oblige provision of safe and convenient access for a range of users, together with adequate parking, services and manoeuvring space; and require consideration of the impact of development on the local highway network.

The Parking Standards in New Developments SPG sets out the maximum parking standards for new developments. Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. The SPG does not include a specific parking standard for self-contained holiday accommodation, however for hotels, one parking space is required per room, and for dwellings one parking space is required per bedroom. The plans appear to provide adequate parking and cycle storage.

Highway Officers were consulted on this enquiry and advised that in principle they have no objection to the proposed development subject to the following:

- *I note the proposed new access will be sited adjacent to a passing place. I would suggest the access is moved to a position outside of the existing passing places on this road to deter any vehicle conflict.*
- *Visibility splays at the point of access shall be in accordance with TAN 18 visibility standards. A speed survey shall be carried out at the point of access to determine the 85 percentile of traffic speeds and the results correlated with TAN 18 to ensure appropriate visibility sightlines are provided.*
- *The siting, design and construction of the means of access to the site shall be submitted.*
- *A Transport Statement shall be provided for the proposals.*

Officers wonder if siting this in the corner alongside the adjoining green mesh fencing of the adjacent utility site (where the pond is currently proposed) could be a suitable location? It would appear that there are less trees here that would be affected by the road coming in and having this at one side could reduce opening up of the frontage and assist with screening being

maintained for the site? In addition, given that traffic needs to queue to enter the car park, this may reduce any congestion in accessing the holiday accommodation.

The car parking area should be formed of gravel or wood chippings and there should be no raised kerbs. It is considered a positive proposal to limit car parking to a primary location and not to provide spaces adjacent to each lodge.

## **Drainage**

### *Surface water drainage:*

Please be advised that since January 2019, new legislation came into force which makes Sustainable Drainage Systems (SuDS) a mandatory requirement on all new developments involving more than a single dwelling or a construction area more than 100m<sup>2</sup>. You must apply to the SuDS Approving Body (SAB) for approval on these types of developments.

It is therefore expected that a detailed drainage strategy for the proposed site be developed as early as possible and early engagement with the Council's SAB Officers is recommended.

Drainage plans showing the proposed surface water drainage details and drainage strategy would then be required to be submitted with any future planning application.

### *Phosphate*

The site is within the River Dee Special Area of Conservation (SAC) Catchment Area in terms of phosphate levels (which covers the River Dee and Tributaries leading into it as it would be water entering the watercourse which could contain phosphate). Applications with the potential to affect riverine Special Areas of Conservations (SACs) which are failing to meet phosphorus water quality standards will need to undergo a Habitat Regulation Assessment Screening/Appropriate Assessment and could require avoidance or mitigation measures to be considered acceptable.

Any application would therefore need to include the relevant details within the submission.

Please see link to Natural Resources Wales website for further advice:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en>

There are currently limited types of drainage that could be screened out; see 'How do I know if a proposal might increase phosphorus levels within the SAC?'. At present, this would be a private sewage treatment systems discharging domestic wastewater to ground, built to the relevant British Standard (BS 6297:2007+A1:2008) as long as the maximum daily discharge rate is less than 2 cubic metres (m<sup>3</sup>), where the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain and is located more than 50m from a SAC boundary. Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4ha (or 25 per km<sup>2</sup>).

**We would recommend that this is investigated fully before the scheme is progressed as this may prevent a larger scheme coming forward as we may not be able to screen out anything in excess of the above at present. A foul and surface water drainage strategy would need to be submitted with any application.** You may want to consider if there are improvements that could be made at the existing site that could be a betterment and provide

capacity for this site – this would be worth investigating and discussing with NRW/LPA. Links to their Developer Services are set out below:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

Natural Resources Wales recently confirmed that there is not any clear guidance available on the technical processes or methodologies that can be used to translate changes in phosphorus loading into impact on site integrity via hydro-ecological analysis. The Local Planning Authority therefore currently have no means of assessing data, knowing how much phosphate would be produced, how it would reach the Special Area of Conservation or what could be appropriate mitigation on applications that cannot be screened out (based on the above criteria). Therefore, whilst this is emerging, it may not be possible for the Local Planning Authority to determine applications as they could be subject to legal challenge and some applications may need to be refused where insufficient information is provided.

### **Site Licence**

If the pods fall within the legal definition of a caravan, they would be subject to a site licensing process. There are model standards for caravan sites including the minimum distance required between caravans and from pitches to boundaries, roads etc.

It may be of use to discuss the proposal with the Councils Licensing Team to ensure the scheme meets their requirements prior to decisions being made on the potential designs in any planning application. The relevant officer is Maureen White, she can be contacted on email [maureen.white@denbighshire.gov.uk](mailto:maureen.white@denbighshire.gov.uk) or phone 01824 706137.

Further information on camping and caravan site licences can also be found on the Council's website:

<https://www.denbighshire.gov.uk/en/business/licences-and-permits/caravan-and-campsite-licence.aspx>

Alternatively, you may need building regulations:

<https://www.denbighshire.gov.uk/en/planning-and-building-regulations/building-regulations/building-regulations.aspx>

### **Ecology:**

Policy VOE 5 requires due assessment of potential impacts on protected species or designated sites of nature conservation, including mitigation proposals, and suggests that permission should not be granted where proposals are likely to cause significant harm to such interests.

This reflects policy and guidance in Planning Policy Wales (PPW 11) Section 6.4 'Biodiversity and Ecological Networks', current legislation and the Conservation and Enhancement of Biodiversity SPG, which stress the importance of the planning system in meeting biodiversity objectives through promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable.

Planning Policy Wales (PPW 11) sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not

cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity” (Section 6.4.5). PPW also draws attention to the contents of Section 6 of the Environment (Wales) Act 2016, which sets a duty on Local Planning Authorities to demonstrate they have taken all reasonable steps to maintain and enhance biodiversity in the exercise of their functions. It is important that biodiversity and resilience considerations are taken into account at an early stage when considering development proposals (Section 6.4.4).

The site is undeveloped land which is located in open countryside with existing trees and hedgerows within and along the periphery of the site, and therefore the site may have biodiversity value or support protected species. The proposed works may also cause disturbance to flora and fauna at and around the site. On that basis a preliminary ecological assessment may be required to be submitted with the application. An ecologist should also assist with the preparation of the lighting scheme as discussed in the AONB section of this statement to ensure that it does not impact upon nocturnal wildlife.

In line with guidance contained in Planning Policy Wales and Future Wales, biodiversity enhancement measures should be included on the pods and around the site to provide a net gain in biodiversity.

We would advise that you contact the Council’s Biodiversity Officer, Joel Walley, to agree the scope of any Ecological Assessment - Email: [joel.walley@denbighshire.gov.uk](mailto:joel.walley@denbighshire.gov.uk)

In addition, the proposals are in close proximity to a number of trees and therefore a tree assessment is required together with a proposed landscape scheme and management plan for the lifetime of the development. It is anticipated that a separate management plan will be needed for the lodge accommodation site as the requirements will be different to that of the commercial felling of Coed Llandegla.

### **Other Issues:**

#### **Environmental Impact Assessment**

Under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (2017 EIA Regulations), it is considered the proposal would fall under Schedule 2 Part 12 e.

The proposal is therefore considered to be Schedule 2 development which requires screening for Environmental Impact Assessment (EIA).

The Council can issue a formal Screening Opinion on the need for EIA upon receipt of a written request for a screening opinion. Any such request would need to be supported by the necessary level of information prescribed in the 2017 EIA Regulations.

Please be advised that should an application for Schedule 2 development be submitted without an Environmental Statement and where a Screening Opinion has not previously been adopted, the Council will be obliged to screen the proposal upon receipt of the planning application, and should a positive opinion be formed, the application will be invalidated until such time as an Environmental Statement is submitted or a Negative Screening Direction has been issued by Welsh Ministers.

### **Informal, without prejudice Officer Opinion of the proposal**

In principle, it is considered that a form of accommodation connected to the mountain bike centre could be acceptable in this location subject to there being significant need demonstrated and that it is appropriate to its setting/capacity within the local environment and infrastructure. The submissions supporting documents confirm that there are no other suitable buildings that could be converted.

If you were to submit an application, a robust business case and detailed supporting statement should be included to demonstrate the proposal is appropriate in nature and scale to its location, with evidence, including details of the business to demonstrate the significant need for this development.

In assessing the proposal, a balance will need to be addressed where the development is of benefit to encouraging tourism activities that benefit the existing business and local economy, whilst protecting the character of the countryside and surrounding landscape, Area of Outstanding Natural Beauty, as well as protected species and the natural environment.

There are a number of recommendations within this report regarding design and layout. However, as highlighted within the drainage section, we do recommend that you consider the phosphate issue primarily as at present, this could have a significant impact upon the scale of development that could be found acceptable.

If you are minded to submit a planning application, I would suggest that the following information is provided as a minimum:

- Completed form and particulars specified in the form
- Plans and/or drawings clearly showing the proposed development.
- Signed certificates
- Required fee

In addition, I would suggest the following information will also be required:

- Drainage strategy (including details of phosphate neutrality or betterment)
- Business Case and Supporting Statement (to include evidence on supporting the local economy, economic need for the business i.e. to support the mountain bike centre, allow overnight stays and economic benefit); information on the local availability and need for suitable tourism accommodation for users of the mountain bike centre; and details of Community Benefits;
- Greater details of the lodges together with information on their permanency, floor plan and utilities requirements
- Landscape and Visual Impact Assessment/ Statement
- Hard and soft landscaping / planting scheme and long term management plan for this part of the site (informed by the Landscape and Visual Impact Assessment, Tree and Ecology surveys)
- Ecological Assessment
- Details of climate and ecological benefits
- Tree Survey
- External lighting assessment and scheme
- A Transport Statement and the following details:
  - Visibility splays plans (at the point of access shall be in accordance with TAN 18 visibility standards).

- Speed survey shall be carried out at the point of access to determine the 85 percentile of traffic speeds and the results correlated with TAN 18 to ensure appropriate visibility sightlines are provided.
- Details of the siting, design and construction of the means of access.

The scheme should include details of all hard and soft landscaping, together with details of ancillary operational development (welfare facilities, parking and turning areas, internal access tracks and footpaths, hard surfaced areas such as patio areas, lighting, boundary treatments, bin storage areas etc.). Foul and surface water drainage details would need to be provided and positions indicated on the plans, together with porosity test results should soakaways be proposed.

A condition would be applied to the permission if it is granted to prevent any of the units being used for permanent residential occupation to maintain them as holiday units only. The site license holder would also be required to maintain an up-to-date register of the names(s) and principal address(es) of the principal occupier(s) of each holiday unit on the site.

I would advise that this response is based on the information available. It does not constitute a formal determination under the Town and Country Planning Act 1990. Any opinions contained herein are those of the Officer concerned and cannot be held as binding on the Council or its members.

Yours sincerely,

Georgia Crawley  
Planning Officer on behalf of Denbighshire County Council