

CADNANT

PLANNING

**LAND AT BLAEN CEFN, PENRHYNDEUDRAETH
DESIGN, ACCESS AND PLANNING STATEMENT**

HOCHTIEF (UK) Construction Ltd

MAY 2023

2022.093_03

DRAFT FOR PRE-APPLICATION
CONSULTATION

Conwy | 20 Connaught House, Riverside Business Park, Benarth Road, Conwy LL32 8UB

Chester | 1 Aldford House, Bell Meadow Business Park, Pulford, Chester CH4 9EP

Design, Access and Planning Statement



Status of report:	Draft issued for PAC	V1.0	May 2023
Author:	Rhys Davies MRTPI		
Checker:	Sioned Edwards MRTPI		
Reviewer:	Sioned Edwards MRTPI		
Approved by:	Sioned Edwards MRTPI		
Document control:	CAD-047 (ver 3) March 2017		

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of Cadnant Planning Ltd. All plans are reproduced from the Ordnance Survey Map with the permission of the Controller HMSO, Crown Copyright Reserved, Licence No. 100020449



Cadnant Planning are accredited by and work to ISO 9001:2015 standard (The British Assessment Bureau)

Contents

1. Introduction..... 1

2. Proposed development..... 3

3. Planning policy context 11

4. Main considerations..... 14

5. Summary and conclusion 28

1. Introduction

Purpose of this document

- 1.1 This Design, Access and Planning Statement (DAPS) accompanies an application by HOCHTIEF (UK) Construction Ltd, for change of use of land for the creation of a temporary off-site living accommodation facility for workers associated with the Eryri Visual Impact Provision (VIP) project, alterations to existing vehicular access, creation of an internal access road, erection of a temporary associated service/welfare building together with associated works on land at Blaen Cefn, Penrhyndeudraeth.
- 1.2 Following the enactment of the Planning (Wales) Act 2015 (the Act) the requirement for pre-application consultation on major development schemes was implemented. This includes the provision of a site area over 1ha. The proposed development exceeds the 1ha site area threshold.
- 1.3 The requirement to carry out pre-application consultation falls under Section 17 of the Act and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) as amended by the 2016 Order. Guidance on carrying out the pre-application consultation requirements within the Act has been provided by the Welsh Government set out in Article 1 of the Town and Country Planning DMPWO (Amendment) 2016 'Guidance on Pre-application Consultation'.
- 1.4 This Design, Access and Planning Statement is issued as part of a suite of documents for Pre-Application Consultation prior to the submission of a formal planning application.
- 1.5 As required by the Town and Country Planning (Development Management Procedure) (Wales) Order (Amendment) 2016 the statement aims to address the following matters;
- Explain the design principles and concepts that have been applied to the development;
 - Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
 - Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and
 - Explain how any specific issues which might affect access to the development have been addressed.

Design, Access and Planning Statement

- 1.6 The site lies principally within the Eryri National Park Authority, with the proposed vehicular access point from the A487 located within the administrative area of Cyngor Gwynedd.

2. Proposed development

The need for the development

- 2.1 Planning permission for the Eryri VIP project was granted under planning permissions NP5/77/336B and C20/0244/08/LL and aims to reduce the visual impact of National Grid's overhead line across the Dwyryd Estuary from Minffordd to Llandecwyn. This would be achieved through the removal of a section of this overhead line and replace it with electricity cables buried in a tunnel underground. It represents a major opportunity to conserve and enhance the special qualities, natural beauty, wildlife and environmental heritage of the precious landscape of Eryri National Park.
- 2.2 The applicant has been appointed by National Grid as the contractor to design and construct the tunnel under the Dwyryd Estuary to house the new underground electricity cables. Removal of the overhead line will be delivered by other contractors under a separate contract with National Grid.
- 2.3 As the project gets underway, the project staff and workforce have been using locally available living accommodation including hotels, B&Bs, rented accommodation and caravans for over a year.
- 2.4 In order to ensure suitable and sufficient accommodation for workers in the tourist seasons as well as through the winters, as well as ensuring that specialist subcontractors can mobilise their best people and accommodate them even at short notice, the applicant proposes the development of temporary off-site living accommodation together with associated facilities and development at the application site to accommodate up to 100 workers. The workers that would be accommodated at the site would be non-home-based workers, mainly undertaking specialist work.
- 2.5 Workers will use the living accommodation to suit their shift patterns which will normally be single shifts, with three shifts per day during the tunnel drive period. Workers would be transported to and from site by shuttle buses.

Site location and description

- 2.6 The application site comprises of a parcel of land which lies between Blaen Cefn Caravan Park to the north and the A487 to the south, on the north-eastern outskirts of Penrhyndeudraeth. The site lies principally within the Eryri National Park Authority, with

Design, Access and Planning Statement

the proposed vehicular access point from the A487 located within the administrative area of Cyngor Gwynedd. The extract in Figure 2.1 identifies the administrative boundary between the authorities with Cyngor Gwynedd (grey shading) to the west and Eryri National Park Authority to the east.

Figure 2.1 Extract of plan showing the administrative boundary between Cyngor Gwynedd and Eryri National Park Authority



- 2.7 The application site comprises of a combination of undeveloped land extending around a lake located centrally within the site with some porous hardstanding areas used as access tracks and circulation space within the site. The extent of the application site is identified in Figure 2.2.

Figure 2.2 Aerial image of application site



- 2.8 There is an access road serving Blaen Cefn Caravan Park to the north-east of the application site. No access would be provided from this existing access road to the application site and proposed development.
- 2.9 The application site lies outside the development boundary of Penrhyndeudraeth, in an open countryside location but is predominantly very well screened from the A487. The A487 to the south is a trunk road. There is an existing vehicular access from the A487 to the site, which would be used to provide access to the application site.
- 2.10 There is an existing Dŵr Cymru Welsh Water which runs through the application site from north to south (which is identified on the proposed site layout plan).
- 2.11 A Public Right of Way runs along the site's northern, eastern and southern boundaries providing pedestrian links between the site and Penrhyndeudraeth.
- 2.12 The application site lies outside areas of flood risk as identified on Natural Resources Wales (NRW)'s Technical Advice Note (TAN 15) Development Advice Maps.

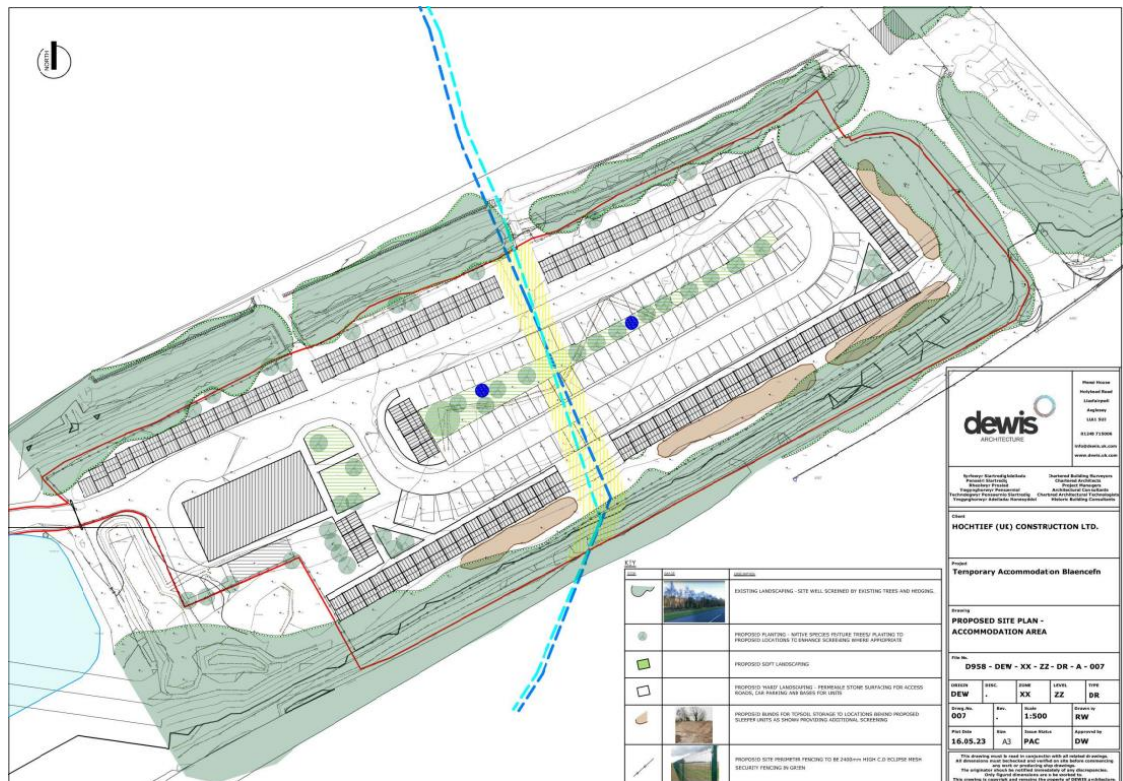
2.13 Special Areas of Conservation (SAC) are located nearby including Meirionnydd Oakwoods and Bat Sites to the north and north-east and Pen Llyn a'r Sarnau to the south.

2.14 The proposed development comprises of the change of use of land to create an off-site temporary living accommodation facility for workers associated with the Eryri VIP project together with the erection of temporary associated service/welfare building, alterations to existing access, creation of internal access road and associated works. The workers accommodation facility is proposed for a temporary period of time, up until December 2025.

2.15 An extract of the proposed site plan is provided in Figure 2.3.

[illegible]

Figure 2.4 Extract of proposed site plan showing the main area of development

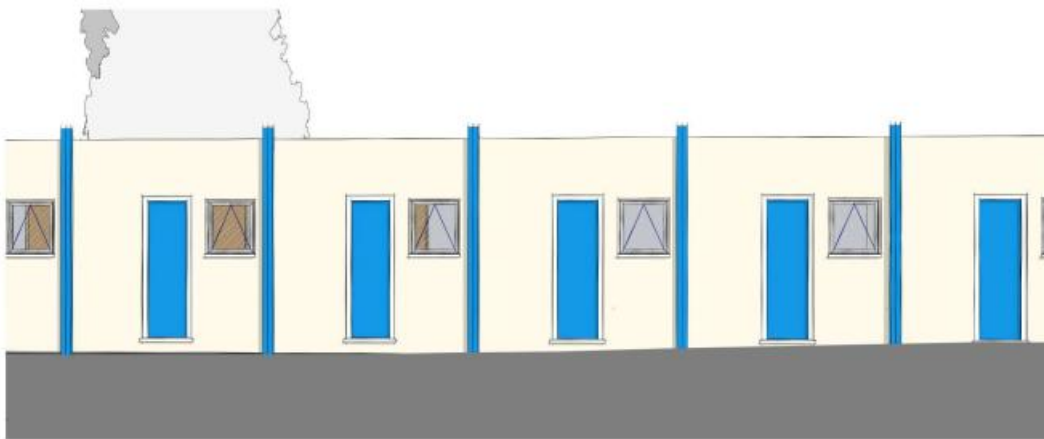


- 2.16 The majority of the off-site temporary accommodation for workers development would be positioned within the north-eastern parcel of the site and a new internal access road would be created to provide a vehicular access from the existing access towards the southern part of the site, from the A487. The proposed internal access road would navigate around an existing lake, which would be retained. The proposed internal access road would be a permanent feature. A security gate would be provided on the approach into the main part of the site from the internal access road. A security cabin would also be provided near the entrance into the main part of the site.
- 2.17 Visibility from the existing vehicular access on the A487 can provide visibility splays of 4.5m x 215m in each direction.
- 2.18 In terms of the general layout of the main part of the site, an extract of the proposed site layout plan is provided in Figure 2.3. The General Services Building would be provided near the internal entrance into the site, with 100 individual ‘bunkabin’ units provided around the external perimeter of the site which would provide the temporary accommodation for workers.

Design, Access and Planning Statement

- 2.19 The general services building would provide a floorspace of 288 sqm measuring 24m x 12m. The general services building would provide a large, shared dining space and clothes washing facilities for workers.
- 2.20 Each 'bunkabin' would measure 2.8m (w) x 4.3m (l). Each 'bunkabin' would provide living accommodation for a single worker comprising of a bed, kitchenette and a bathroom. The 'bunkabin' units would avoid the water main and the 3m exclusion zone each side. 100 car parking spaces would be provided centrally within the site. An extract of the elevations for the accommodation units is provided in Figure 2.5 and the general services building in Figure 2.6.

Figure 2.5 Extract of proposed elevations of accommodation units

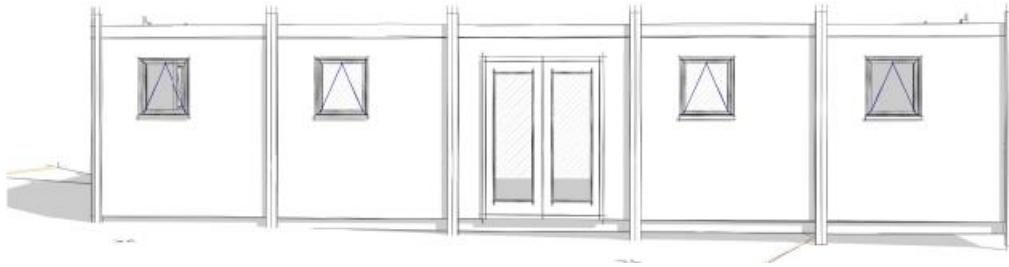


- 2.21 The proposed materials are as follows:

Sleeper units:

- Roof: corrugated steel deck finish
- External walls: Tanalised softwood stud walls, filled with injected polyurethane foam insulation, finished either side with a plastisol steel cladding in off-white, sat in between blue steel SHS columns sat on adjustable steel legs.
- External doors: Polyurethane insulated door with plastisol steel cladding to both sides. Colour to be blue.
- External windows: ISS window with integrated shutter. Colour to be white
- Rainwater goods: white uPVC

Figure 2.6 Extract of proposed elevations of general services building



General services building:

- Roof: corrugated steel deck finish
- External walls: Tanalised softwood stud walls, filled with injected polyurethane foam insulation, finished either side with a plastisol steel cladding in light grey, sat in between light grey steel SHS columns sat on adjustable steel legs.
- External doors: Polyurethane insulated door with plastisol steel cladding to both sides. Colour to be grey.
- External windows: ISS window with integrated shutter. Colour to be white
- Rainwater goods: white uPVC

- 2.22 A plant area would be provided to the rear of the general services building and two package treatment plans would be installed to deal with foul drainage from the development.
- 2.23 The existing entrance to the north towards Blaen Cefn Caravan Site would be closed off with a gate and the existing entrance towards Blaen Cefn would only be used to serve Blaen Cefn Caravan Site and would not be used to serve the proposed development in any way.
- 2.24 Access to the Public Right of Way along the northern boundary would be retained, which would provide a safe pedestrian access into Penrhyndeudraeth. A secured pedestrian access gate would be provided, together with secure perimeter fencing for security and to avoid encroachment onto areas protected for their biodiversity value.

Landscaping

- 2.25 Pockets of soft landscaping would be provided internally within the site mainly between the car parking areas centrally within the site and in front of the general services building. Topsoil would be stored in bunds to the rear of the bunkabins which would

Design, Access and Planning Statement

provide additional screening towards the site. Additional landscape planting is proposed along the site's boundary along the A487 to enhance screening in the form of underplanting of the existing dense woodland screen which limits visibility of the site from the A487. This landscaping would comprise of native species featuring trees and shrubs. Security fencing is proposed along the site's perimeter, details of which are provided on the proposed landscaping plan.

Construction of the proposed development

- 2.26 Construction of the proposed development would be undertaken by local workers, all of whom are from the LL postcode area and therefore would already be living in the local area and travelling to work daily.

Operation of the proposed development

- 2.27 It is anticipated that the accommodation would be inhabited by construction workers from April 2024 onwards and likely to operate until December 2025 whilst the Eryri VIP project is under construction.

Decommissioning of the proposed development

- 2.28 The proposed accommodation would be a temporary facility and is expected to be decommissioned December 2025.
- 2.29 All buildings would be removed. The proposed modular construction of these buildings would allow this to be done with relative efficiency. The internal access road would be retained. Drainage infrastructure would also be retained.
- 2.30 The areas of permeable parking would be removed and these areas, together with the locations where the buildings have been removed, would be allowed to regenerate naturally with rough grassland and other colonising vegetation.
- 2.31 The link through to the Public Right of Way would be retained as part of the decommissioning of the site. The perimeter fencing would be removed.

3. Planning policy context

- 3.1 National and local planning policy guidance considered relevant to the principle of this development is set out in this section.

National planning policy and guidance

- 3.2 The proposal relates to a temporary workers accommodation and relevant national planning policy is set out in:
- Future Wales: The National Plan 2040 (2021)
 - Planning Policy Wales (PPW) Edition 11, (2021);
 - Technical Advice Note (TAN) 5 Nature and Conservation (2009);
 - TAN 12 Design (2016);
 - TAN 18 Transport (2007);
 - TAN 20 Planning and the Welsh Language (2017); and
 - TAN 23 Economic Development (2014).
- 3.3 A summary of all relevant national and local planning policies relating to the proposed development is provided in table 3.1 below. Policies relating to the potential effect of the development on the Welsh language are set out within the CLIA.

Table 3.1 National planning policy and guidance

Document	Summary
<i>Future Wales: The National Plan 2040 (Welsh Government February 2021)</i>	This is the recently produced national development framework which sets the direction for development in Wales to 2040 at a strategic level. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.
<i>Planning Policy Wales (Edition 11) (Welsh Government, 2021)</i>	Planning Policy Wales (PPW) sets out the national planning policy framework for Wales and proposals should be in line with the guidance within it. Paragraph 1.18 of Planning Policy Wales (PPW) states that “Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless

Design, Access and Planning Statement

	<p><i>material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.”</i></p> <p>It is underpinned by the principles of sustainable development and is in line with the Welsh Government’s Well Being agenda as set out in the relevant Act. PPW is supplemented by a series of Technical Advice Notes on a number of topics.</p> <p>The guidance considers elements such as protecting the Welsh Language, accessibility, sustainable modes of transport, housing and affordable housing, commercial land uses, the historic environment and tourism.</p> <p>The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.</p> <p>New development should contribute towards the delivery of sustainable development and improve the social, economic, environmental and cultural well-being of Wales.</p> <p>Paragraph 2.27 states <i>“Planning authorities should ensure that social, environmental and cultural benefits are considered in the decision-making process...”</i>.</p>
Technical Advice Notes (TANs)	
TAN 5 Nature and Conservation (2009)	Provides advice on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
TAN 12 Design (2016)	The purpose of this TAN is to provide advice on how to promote sustainability through good design and the importance of good design and the context of sites.
TAN 18 Transport (2007)	This TAN recognises the links between land use planning and transport, and the need to meet sustainable development objectives.
TAN 20	The purpose of this TAN is to provide guidance on how the Welsh language may be given appropriate consideration in the

Design, Access and Planning Statement

Planning and the Welsh Language (2017)	planning system and on compliance with the requirements of planning and other relevant legislation.
TAN 23 Economic Development (2014)	This defines what is meant by economic development and states that it includes economic land uses such as retail, tourism and public services.

Local planning policy and guidance

3.4 The adopted development plan consists of Eryri Local Development Plan (LDP) 2016-2031. The most relevant policies from the Eryri LDP which are considered to be relevant to the consideration of this planning application include:

- Strategic Policy A: National Park Purposes and Sustainable Development;
- Strategic Policy C: Spatial Development Strategy;
- Strategic Policy D: Natural Environment;
- Development Policy 1: General Development Principles;
- Development Policy 2: Development and the Landscape;
- Development Policy 6: Sustainable Design and Materials;
- Development Policy 18: The Welsh Language and the Social and Cultural Fabric of Communities; and
- Strategic Policy L: Accessibility and Transport.

3.5 The Authority has adopted a suite of Supplementary Planning Guidance's (SPG's) and the following are considered to be material in relation to the proposed development.

- SPG 2 General Development Considerations;
- SPG 6 Nature Conservation and Biodiversity;
- SPG 7 Landscapes and Seascapes of Eryri; and
- SPG 14 Obtrusive Lighting (Light pollution).

4. Main considerations

- 4.1 The proposal has been subject to a pre-application enquiry with a response received from the Local Planning Authority in February 2023. The site lies principally within the Eryri National Park Authority, with the proposed vehicular access point from the A487 located within the administrative area of Cyngor Gwynedd.

Principle of development

- 4.2 The pre-application response noted that the proposal would be contrary to a number of policies set out in the Eryri LDP given the location of site outside any defined development boundary. However, it was acknowledged in the pre-application enquiry response that the use of the site for workers' accommodation would be temporary and that the site is in close proximity to the site of the National Grid VIP. With this in mind, the Local Planning Authority concluded that there is scope for Officers to support the proposal in principle.
- 4.3 The key issue which the Local Planning Authority required to be submitted with a planning application was an assessment of alternatives, showing that the use of other sites in the vicinity has been fully considered and that the site at Blaen Cefn is fully justified in the absence of other alternatives.

Assessment of Alternative Sites

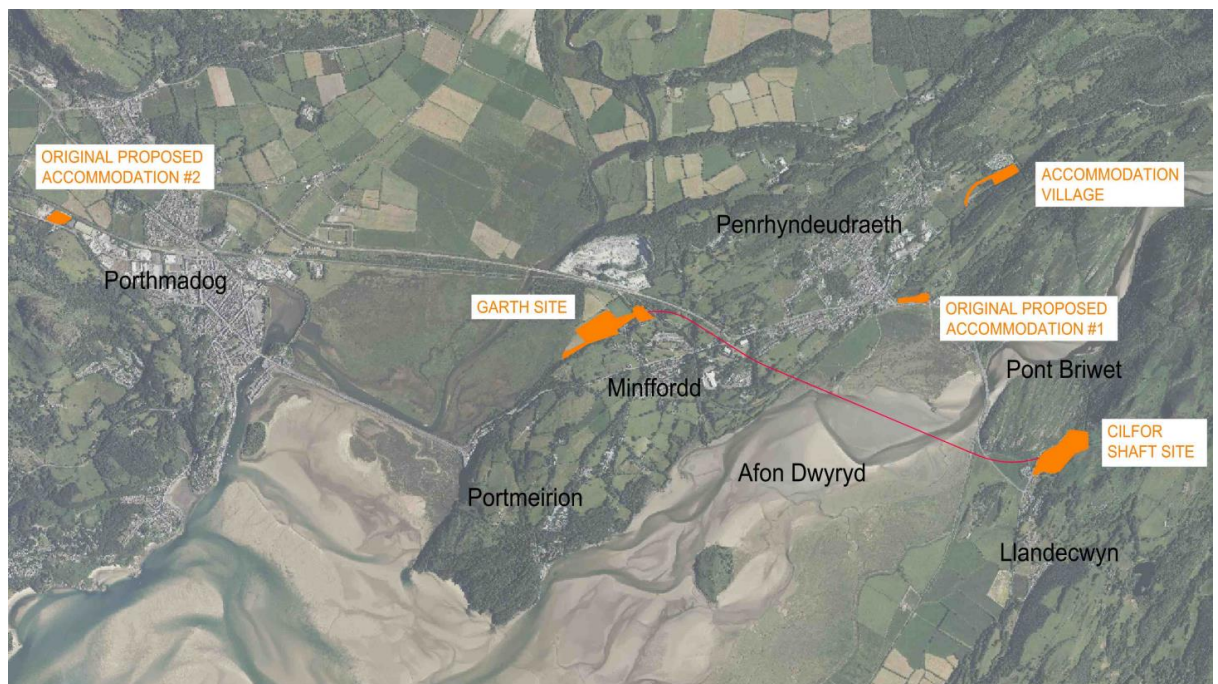
- 4.4 The field of search for the workers' accommodation site concentrated principally on Penrhyndeudraeth and Porthmadog, given that proximity to the main construction sites at Cilfor and Garth was essential and also that the workers' accommodation site was accessible to local services by foot; cycle and public transport, in the interests of sustainable development. A 5km radius from the construction sites at Cilfor and Garth was considered to be the maximum extent of the search area, given the nature of the work; shift patterns and the need to keep travel to site time to a minimum. The 5km search area would include all areas within the development boundary of Porthmadog and Penrhyndeudraeth.
- 4.5 A search of a wider area was carried out to ascertain if any capacity was available on existing lodge; caravan; and glamping sites with contact made with site owners as far west as Criccieth. Feedback from site owners and from contact with the Gwynedd and Anglesey Branch of the British Holiday and Home Park Association (BH&HPA) which

Design, Access and Planning Statement

has over 190 site owning members withing the branch was that all sites in the area were either up to capacity or were not willing to accommodate workers at the expense of retaining capacity during peak holiday periods.

- 4.6 The image below indicates the location of the now preferred accommodation site at Blaen Cefn, its proximity to the main construction sites at Garth and Llandecwyn (see Figure 4.1) and also indicates the location of two alternative sites which were assessed in considerable detail prior to the identification of the Blaen Cefn site (application site) as the only suitable alternative. Site No.1 being the Cookes Field site at Penrhyndeudraeth and Site No.2 being a site at Penamser Road, Porthmadog.

Figure 4.1 Map showing location of the application site, main construction sites at Garth and Llandecwyn and two other sites considered



- 4.7 Sites within Cyngor Gwynedd and outside the National Park were initially viewed as preferable with a preference for previously developed land to align with the principles of sustainable development set out within national planning policy. However, a key constraint which, following discussion with Cyngor Gwynedd led to the dismissal of a number of sites within Porthmadog and Penrhyndeudraeth was the fact that most of the potentially suitable and available previously developed sites were within an area constrained by flood risk.
- 4.8 The Welsh Government is due to implement a revised TAN 15 during 2023. This will be supported by the Flood Map for Planning, which shows how climate change will

Design, Access and Planning Statement

affect flood risk extents over the next century. The map shows the potential extent of flooding assuming no defences are in place. The Flood Map for Planning has no official status until the Welsh Government implements the revised TAN 15. However, it represents the best available information we have on flood risk and Natural Resources Wales will continue to use this to inform our planning advice.

- 4.9 Discussion with Cyngor Gwynedd as the Local Planning Authority covering the area within which the preferred sites were located, indicated clearly that highly vulnerable workers accommodation would not be supported, even on a temporary basis, within an area shown to be at risk of flooding.
- 4.10 The Flood Map for Planning extract in Figure 4.2 indicates that the majority of areas within Porthmadog and the area covering the initial preferred sites within Gwynedd at the Cookes Field Site, Penrhyndeudraeth and at Penamser Road, where feasibility schemes were produced, were constrained by flood risk and these sites had to be dismissed.

Figure 4.2 Extract of Flood Map for Planning covering areas surrounding Porthmadog and Penrhyndeudraeth

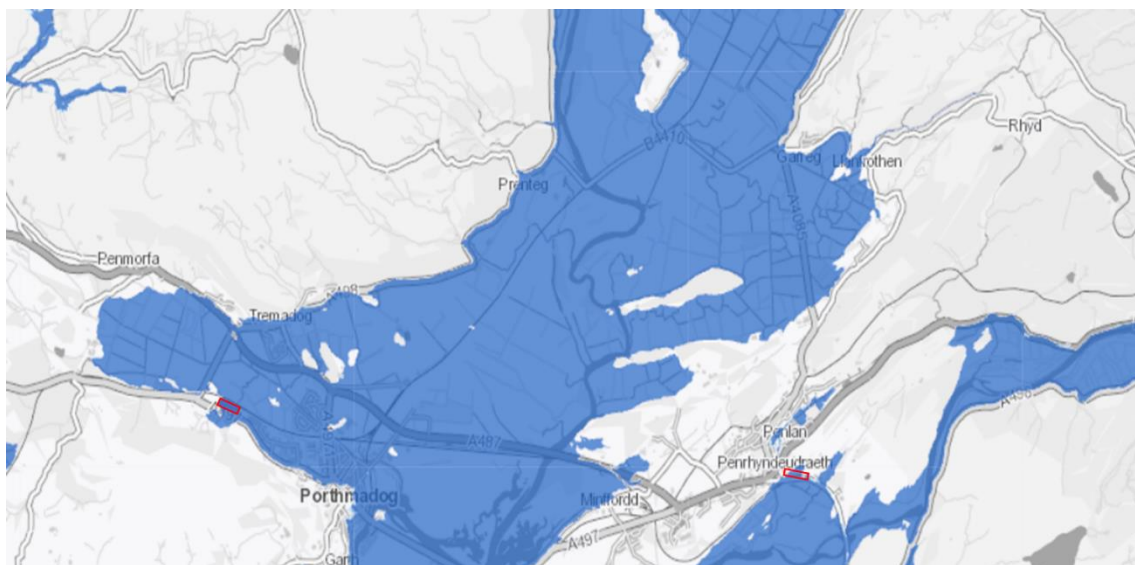


Figure 4.3 Cookes Field Site Feasibility Plans

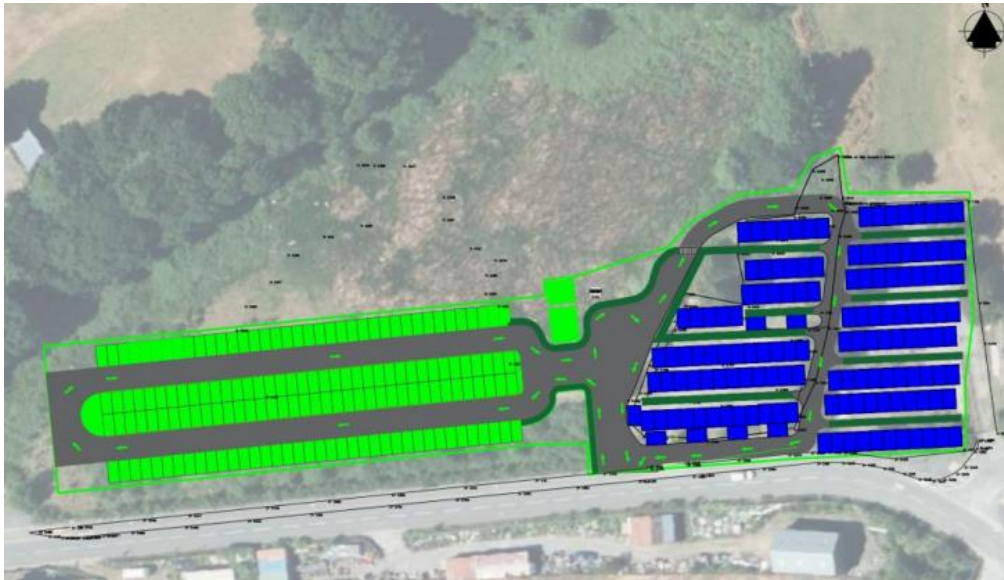


Figure 4.4 Cookes Field Flood Risk Plan – access and egress only across Flood Zone

3



- 4.11 Feasibility plans were also produced for the site at Penamser Road, Porthmadog as indicated below.

Figure 4.5 Penamser Road site feasibility layout



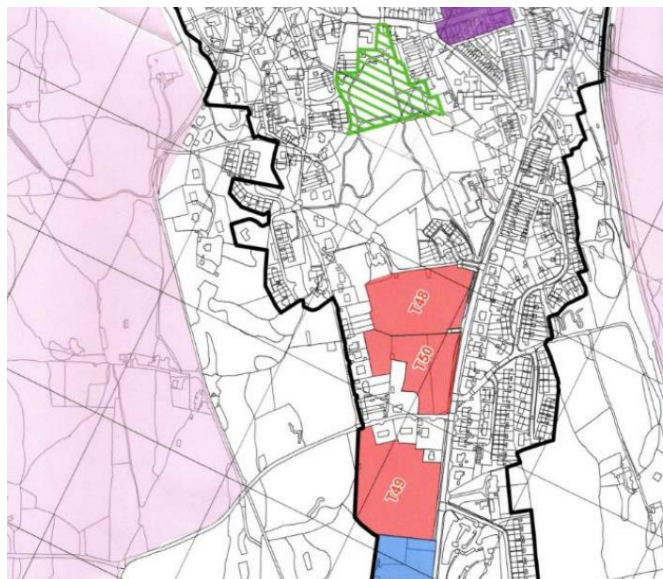
- 4.12 Although the Penamser Road site appeared available and an agreement could be reached with the landowner, the site was also dismissed as a workers accommodation site due to flood risk constraints following informal pre-application discussion with LPA Officers. The site can however be utilised for storage and compound uses associated with the project.

Figure 4.6 Penamser Road Preferred Site Flood Map Extract



- 4.13 Within Penrhyndeudraeth, allocated housing sites as identified in the Gwynedd and Anglesey Joint Local Development Plan (JLDP) were assessed. The sites are identified in Figure 4.7 as housing sites T48; T49 and T50. The applicant worked with a local developer to approach the landowners of the respective sites but a combination of lack of willingness to bring the sites forward for temporary accommodation, topographic and drainage constraints led to the sites being dismissed as suitable for the proposed workers accommodation.

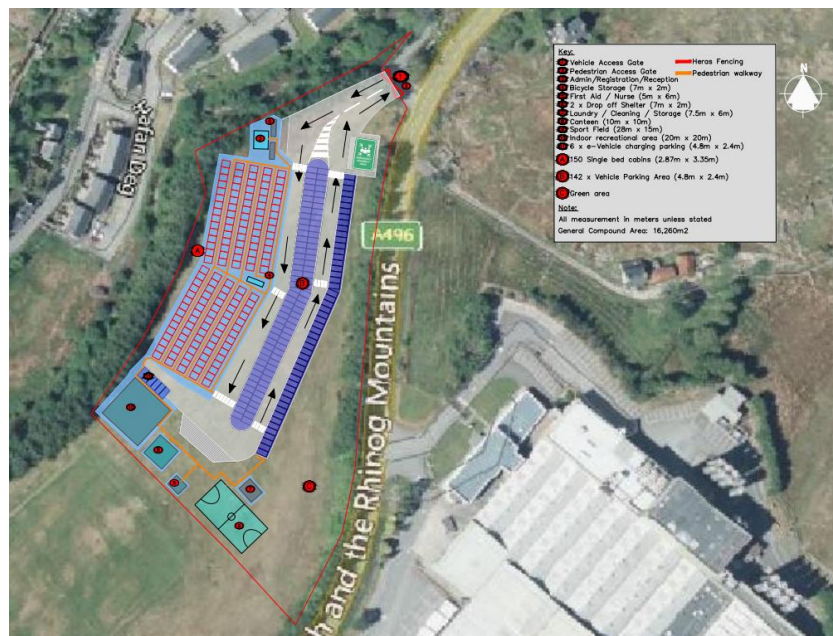
Figure 4.7 Extract of the Gwynedd and Anglesey JLDP Proposals Map



Design, Access and Planning Statement

- 4.14 Following on from the conclusion that there appeared to be no suitable sites within Porthmadog or Penrhyndeudraeth, the search area was extended to cover sites further afield at Blaenau Ffestiniog, though they were not located within the initially preferred travel to work distance. Detailed consideration was given to a site which was predominantly outside the flood zone near the Rehau site. This site was assessed in detail with initial ecology; flood risk; transport assessment and design work carried out to assess feasibility. The feasibility scheme set out below (Figure 4.8) was considered deliverable, though ultimately a combination of distance from the main construction sites and confirmation from the landowner that the site was not available led to its dismissal.

Figure 4.8 Feasibility Layout for former sports field opposite Rehau Site, Blaenau Ffestiniog



- 4.15 At this stage, the site at Blaen Cefn was identified as available and, following negotiations with the landowner further design work; biodiversity assessment; transport assessment; clarification of no flood risk constraints led to the submission of a proposal as a pre-application enquiry. In the absence of suitable alternatives, the site at Blaen Cefn has been selected as the preferred workers accommodation site and now forms the subject of this Statutory Pre-Application Consultation process.

Access and transport

- 4.16 Strategic Policy L: Accessibility and Transport advises that the National Park Authority is committed to improving access to local facilities and reduce the need to travel especially by private car. Within the National Park walking and cycling, improved access to public transport and provision of facilities will be encouraged. These principles were considered during the initial search for sites and the application site is considered to be located in a sustainable and accessible location within close proximity (walking distance) to Penrhyndeudraeth, and around 4 miles from Porthmadog, which is accessible by public transport.
- 4.17 Vehicular access to the application site and the proposed development would be via an existing vehicular access from the A487, which is a Trunk Road. Alterations are proposed to this access through widening the access road to 7.5m. Visibility from the existing vehicular access on the A487 can provide visibility splays of 4.5m x 215m in each direction. Detailed drawings of the access are included as part of the application including swept path analysis.
- 4.18 The vehicular access lies in Cyngor Gwynedd's administrative boundary. Therefore a planning application to alter the access will be submitted to Cyngor Gwynedd alongside a planning application for the change of use of land which lies in Eryri National Park Authority.
- 4.19 A new access road would be constructed internally to serve the temporary accommodation units within the main part of the site.
- 4.20 The application is accompanied by a Transport Statement which assesses trip generation associated with the proposed development. As detailed in the Transport Statement, workers would be working 6 days a week around three shifts (as follows), with maintenance shift on Sundays:
- 06:00hrs to 14:00hrs;
 - 14:00hrs to 22:00hrs; and
 - 22:00 to 06:00hrs.
- 4.21 A maximum number of 60 workers would be working during each shift. At each shift change over time, a maximum of eight single trips would have to be made to transport all the shift workers to work, and also from work back to their temporary accommodation at the application site. As there is very limited car parking at Garth's tunnel head,

Design, Access and Planning Statement

temporary workers staying at the application site are unlikely to use their personal cars to travel to work.

- 4.22 The Transport Statement concludes that an additional eight single trips at each shift change over time is likely to produce a negligible impact on the surrounding road network. Opportunities have been identified to minimise the frequency of motor vehicle trips from the site. These include transporting shift workers to and from the site via minibus, shift patterns outside of normal working hours, and utilisation of a footpath at the rear of the site to provide connectivity into Penrhyndeudraeth for pedestrians.
- 4.23 The Transport Statement concludes that the proposed development is acceptable from a transport perspective.

Residential amenity

- 4.24 The nearest residential receptors include Blaen Cefn, Beudy Newydd, Ty'n y Ffridd, Bryn Berthan and Pen Cefn which are within around 200m from the main living accommodation part of the application site. Blaen Cefn Caravan Park also lies immediately to the north of the main part of the site where the temporary living accommodation units would be positioned.
- 4.25 A rental agreement and code of conduct will be prepared to reinforce respect for neighbours, appropriate behaviour and to encourage volunteering and work in the community.
- 4.26 Immediate neighbouring residential dwellings and the caravan park at Blaen Cefn are expected to experience some disruption from noise during the construction period including from construction traffic. This would be managed and mitigated as best as possible through the submission of a Construction Traffic Management Plan that is expected to be conditioned as part of the planning application. The set up of the application site to accommodate the temporary accommodation facility is expected to take a few months.
- 4.27 The main living accommodation part of the application site is well screened and enclosed by mature trees and screening and therefore there would be limited visual effects of the proposed development from the nearest residential receptors. The enclosed nature of the site would also assist with containing noise and light associated with the operation of the temporary living accommodation facility within the site itself.

Design, Access and Planning Statement

- 4.28 The proposed use of the existing vehicular access (which is separate from the access to Blaen Cefn) would also mean that there would be no overlap between vehicular movements associated with the proposed development and Blaen Cefn Caravan Park or the residential property of Blaen Cefn which would use a separate vehicular access.
- 4.29 As previously noted, workers would be travelling to and from the site to the main construction site using organised shuttle buses, which would pick up and drop off around the three shift patterns noted below (Mondays to Saturdays, with only maintenance shifts on Sundays):
- 06:00hrs to 14:00hrs;
 - 14:00hrs to 22:00hrs; and
 - 22:00 to 06:00hrs.
- 4.30 The Transport Statement confirms that at each shift change over period, a maximum of eight single trips would have to be made to ensure all temporary workers access work and the temporary accommodation via minibus. Some of these trip movements would be early in the morning (around 06:00) and late at night (around 22:00) however the limited number of vehicular movements, would result in minimal disruption to nearby residential and caravan park residents and occupiers.
- 4.31 Off-shift works will of course be expected to travel to and from the site occasionally to access services and facilities which may be available in Penrhyndeudraeth, or at Porthmadog, however, the vehicular access into the site is located away from sensitive receptors and is unlikely to have an unacceptable adverse effect on residential amenity.
- 4.32 Workers would be encouraged to use a Public Right of Way which provides a link between the application site and Penrhyndeudraeth, reducing the need to travel by car. Secure bike parking will also be provided at the application site, which would encourage a non-car-based mode of transport.

Landscape and visual impact

- 4.33 Development Policy 2: Development and the Landscape advises that the scale and design of new development, including its setting, landscaping and integration should respect and conserve the character, qualities and views of the landscape.
- 4.34 Whilst searching for sites, consideration was given to the landscape setting and screening available in order to integrate the site into its surroundings as best as

Design, Access and Planning Statement

possible, whilst also acknowledging that the proposal is for a temporary period of time with the land to be restored to its original condition following decommissioning.

- 4.35 The proposed temporary buildings (sleeping accommodation) would comprise of off-white coloured units with blue doors and windows, whilst the general services building would comprise of light grey coloured units with grey doors. The colours of the units would reflect the types of units that would be expected within a construction compound, reflecting the temporary nature of the use and operation.
- 4.36 The pre-application enquiry advice received from Eryri National Park Authority notes that the screening on the boundary of the site is well established. A photograph to identify the extent of the boundary screening is provided in Figure 4.9. As can be seen in Figure 4.9, the boundary screening is mature and well established and provides an effective screening from the road.

Figure 4.9 Photograph showing the boundary screening between the application site and the A487



- 4.37 The pre-application enquiry noted that the Authority would be looking for further landscaping measures and biodiversity enhancements. In light of this, the application includes pockets of soft landscaping which would be provided internally within the site

Design, Access and Planning Statement

mainly between the car parking areas centrally within the site and in front of the general services building.

- 4.38 Topsoil would be stored in bunds to the rear of the bunkabins which would provide additional screening towards the site. Additional landscape planting is proposed along the site's boundary along the A487 to enhance screening in the form of underplanting of the existing dense woodland screen which limits visibility of the site from the A487. This landscaping would comprise of native species featuring trees and shrubs. Security fencing is proposed along the site's perimeter, details of which are provided on the proposed landscaping plan.

Biodiversity

- 4.39 The application is accompanied by a Preliminary Ecological Appraisal which confirms that a Phase 1 Habitat Survey has been undertaken along with a Preliminary Bat Roost Assessment of the trees in proximity to the working areas.
- 4.40 Special Areas of Conservation (SAC) are located nearby including Meirionnydd Oakwoods and Bat Sites to the north and north-east (designated for the large population of lesser horseshoe bats) and Pen Llyn a'r Sarnau to the south. Gwaith Powdwr Local Nature Reserve lies around 0.3km from the application site and is of interest for the large population of native reptiles and lesser horseshoe bats. There are a number of Sites of Special Scientific Interest (SSSI) nearby including Coedydd Dyffryn Ffestiniog (Gogleddol), Mwyngloddio Llanfrothen, Glaslyn, Morfa Harlech and Ysbyty Bron y Garth.
- 4.41 The habitats at the application site are generally of low ecological value, with the caravan site being a mix of manmade hardstanding and disturbed improved grassland. The access is via existing access routes, using nearby roads. There will be no vegetation removal associated with the works and the accommodation will be sited on existing hardstanding and improved grassland.
- 4.42 No potential bat roosting features were identified within the working area of the application site. The mature trees in the wider area are suitable for roosting bats, however no works will be undertaken in this area.
- 4.43 The application site has moderate potential for foraging and commuting bats, however the works will be undertaken in the daytime outside of the bat active season and therefore there will be no night-time lighting during the works that could negatively affect

Design, Access and Planning Statement

any foraging bats by restricting their range. The accommodation block will have night-time lighting and recommendations regarding the lighting are included.

- 4.44 There would be no effect on badger setts however good practice construction measures are proposed.
- 4.45 The trees and hedgerows in the Site boundary could support nesting birds during the breeding season. The proposed development will retain and protect hedgerows and is not considered to have a significant effect on breeding birds, provided the works are carried out following recommendations provided.
- 4.46 The PEA recommends good practice construction measures to minimise noise and to avoid pollution.
- 4.47 Due to the proximity of the application site to nearby SACs a shadow Habitat Regulation Assessment (HRA) has been undertaken and is included as part of the application.

Welsh language and culture

- 4.48 Development Policy 18: The Welsh language and the Social and Cultural fabric of communities advises that in determining all planning applications within the National Park, the needs and interests of the Welsh language will be taken into account.
- 4.49 In accordance with Development Policy 18, the application is accompanied by a Community and Linguistic Impact Assessment (CLIA).
- 4.50 The CLIA identifies that the proposal would lead to the introduction of up to 100 non-home-based workers who would reside at the application site for a temporary period of up to 21 months. This would lead to a temporary increase in the population of Penrhyndeudraeth and temporarily increase the number of non-Welsh speakers in the ward.
- 4.51 The temporary increase in population and the number of non-Welsh speakers has the potential to adversely affect the Welsh language in Penrhyndeudraeth, through a dilution of the use of the language within the community. This effect would be temporary over a period of up to 21 months.
- 4.52 As part of the applicant's commitment to the local community, the applicant is promoting and raising awareness of Welsh language and culture amongst their workforce.

Design, Access and Planning Statement

Additional measures are also proposed to raise awareness of the Welsh language and culture amongst non home-based workers.

- 4.53 Beneficial effects are expected in terms of impacts on local businesses and local jobs through the creation of employment opportunities to support existing businesses and jobs in the LL postcode including SMEs and local businesses. The Local Workforce Strategy will ensure decent work in the supply chain by engaging local subcontractors, and locally advertising works suitable for SMEs.
- 4.54 The majority of these would support existing job roles and the proposed development provides economic opportunities for existing workers but would lead to limited new or additional jobs.
- 4.55 The employment opportunities for local businesses and local jobs in the LL postcode will include a proportion of Welsh speakers, which is considered to be a beneficial effect for the Welsh language. Developments which provide local employment opportunities will help retain existing Welsh speakers who will use the language daily, in the community and in the workplace. The proposed development therefore has the potential to support the long-term vibrancy of the Welsh language in the LL postcode area through the provision of support for existing jobs for local people, including Welsh speakers.
- 4.56 In conjunction with the Welsh Government's Supplier Development Service, HOCHTIEF will hold a 'Meet the Buyer' day in the early stages of the project and at key milestones to enable as many local suppliers as possible to meet us and explore opportunities to work together. This will maximise opportunities for local businesses.
- 4.57 The proposal is also expected to have a beneficial effect on local services and facilities in the rural catchment of Penrhyndeudraeth as well as the town of Porthmadog as the proposal would lead to spin-off spending in the local economy for up to 21 months. Workers may also visit locations further afield on their days off, supporting the local economy further.
- 4.58 An overall neutral effect is identified in terms of out-migration, age structure, impact upon health, amenity, crime/violence, economic diversity, local wages, cost of housing, local schools, health care provision, local services and local voluntary/activity/youth groups.

5. Summary and conclusion

- 5.1 The application seeks consent for change of use of land for the creation of a temporary off-site living accommodation facility for workers associated with the Eryri VIP project, alterations to existing vehicular access, creation of an internal access road, erection of a temporary associated service/welfare building together with associated works on land at Blaen Cefn, Penrhyndeudraeth.
- 5.2 The site lies principally within the Eryri National Park Authority, with the proposed vehicular access point from the A487 located within the administrative area of Cyngor Gwynedd. In light of this, a planning application will be submitted to Cyngor Gwynedd to seek consent for alterations to the existing vehicular access, alongside an application to Eryri National Park Authority in relation to the change of use of land to create a temporary living accommodation facility for workers.
- 5.3 Planning permission for the Eryri VIP project has been granted to reduce the visual impact of National Grid's overhead line across the Dwyrdd Estuary from Minffordd to Llandecwyn. This would be achieved through the removal of a section of this overhead line and replace it with electricity cables buried in a tunnel underground.
- 5.4 The proposed development is required in order to ensure suitable and sufficient accommodation is available for workers associated with the Eryri VIP during tourist seasons as well as through the winters. The facility would provide temporary accommodation for up to 100 workers and is expected to be operational between April 2024 and December 2025.
- 5.5 An extensive search for a suitable site to house the temporary accommodation for workers has been undertaken by the applicant, principally considering sites in the Porthmadog and Penrhyndeudraeth area, given the need to be close to the main construction sites at Garth and Llandecwyn. Sites within Cyngor Gwynedd and outside the National Park were initially viewed as preferable with a preference for previously developed land to align with the principles of sustainable development set out within national planning policy.
- 5.6 A number of sites were discounted due to flood risk issues. Allocated housing sites in Penrhyndeudraeth were considered but a combination of lack of willingness to bring the sites forward for temporary accommodation, topographic and drainage constraints led to the sites being dismissed as suitable for the proposed workers accommodation. A site further afield at Blaenau Ffestiniog was considered, although being outside the

Design, Access and Planning Statement

initially preferable travel to work distance. A combination of distance from the main construction sites and confirmation from the landowner that the site was not available led to its dismissal.

- 5.7 In the absence of suitable alternatives, the site at Blaen Cefn has been selected as the preferred workers accommodation site and now forms the subject of this Statutory Pre-Application Consultation process.
- 5.8 The application is accompanied by ecological surveys, a Transport Statement, Drainage Strategy and Community and Linguistic Impact Assessment which considers the potential effects of the proposed development.
- 5.9 Whilst the proposal is a departure from the policies within the adopted development plan, however, the proposal would be temporary in nature and is required in order to support the Eryri VIP project which will assist to deliver a major opportunity to conserve and enhance the special qualities and natural beauty, wildlife and environmental heritage of the Eryri National Park.

APPENDIX A

Hochtief Accommodation Sites

Temporary workers accommodation - Review of sites								
	Site	Development Boundary	Flood Risk	PDL	Sustainable Location	LPA	Other	Rating
	Driving Range, Porthmadog	Outside	Yes	No	Relatively	Gwynedd		
	Quad Biking Site, Porthmadog	Outside	Yes	Partly	Relatively	Gwynedd		
1	Field Opposite Rock Engineering Site,Tremadog	Outside	Yes	No	Relatively	Gwynedd	Listed Building on Rock Engineerign Site	
2	Vinci and Gas Pipelie Sites	Inside	Yes	Yes	Yes	Gwynedd		
3	Blaen Cefn Penrhyndeudraeth	Outside	No	No	Yes	Gwynedd and SNPA	Outside developemnt boundary and within National Park - but very well screened and good accessibility	
4	Field Opp SNPA Offices	Inside	No	No	Yes	Gwynedd	Allocated housing Site T49	
5	Land near Manod Cemetery	Outside / adjoining	No	No	Yes	Gwynedd	Adjoining developemmt boundary; topography and access constraints	
6	Football Field Rehau	Inside	No	No	Yes	Gwynedd	Allocated for housing T23	
7	Land off Oakley Square	Outside	No	No	Yes	Gwynedd		
8	Penamser Road, Porthmadog	Inside	Yes	Yes	Yes	Gwynedd	Flood Risk Constraint	
9	Cookes Field Site	Inside	Yes - partly	Yes - partly	Yes	Gwynedd	Flood Risk in part and no suitable access/egress for highly vulnerable development	
10	Land Opposite Rehau (fomer playing field)	Outside	Yes - partly	No	Relatively	Gwynedd	Possible issue with loss of sports field with potnetial Sport Wales objection; flood risk may constrain access	

CADNANT

PLANNING

Conwy | 20 Connaught House, Riverside Business Park, Benarth Road, Conwy LL32 8UB
| 01492 581800

Chester | 1 Aldford House, Bell Meadow Business Park, Pulford, Chester CH4 9EP
| 01244 621007

www.cadnantplanning.co.uk