

# CADNANT

PLANNING

**CAE DU CAMPSITE, BEDDGELERT  
DESIGN, ACCESS AND PLANNING STATEMENT**  
ROBERTS GROUP  
February 2025  
2020.011\_03

DRAFT FOR PRE-APPLICATION  
CONSULTATION

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## Design, Access and Planning Statement



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# 1. Introduction

- 1.1 This Design, Access and Planning Statement accompanies an application by Roberts Group, for full planning permission for proposals to enhance tourist accommodation and facilities at Cae Du and Cae Canol Campsite, Beddgelert to deliver overall improvements to the site by way of creation of additional touring/camping pitches, erection of new toilet blocks, and overall improvements in terms of additional landscape planting and biodiversity enhancement together with associated works.
- 1.2 Cae Du and Cae Canol Campsite were bought in 2024 by the applicant, Roberts Group, who are a small local family company who own various caravan and camping sites, predominantly across Gwynedd. The Roberts Group have over 2,000 pitches over nine parks along with two small lodge Parks and two static caravan holiday Parks.
- 1.3 Prior to this, unfortunately, Cae Du campsite has been largely closed over recent years (three seasons between 2020 and 2023) meaning that the village and the local economy has not benefitted from the upturn in holidaying within the UK due to the Covid pandemic. Consequently, this has resulted in major pressure on other holiday providers in the area as well as extensive wild camping at unauthorised locations and reduced footfall and revenues for Beddgelert's economy.
- 1.4 Cae Du benefits from planning permission for 15 touring caravans and 70 camping pitches. Cae Canol also benefits from a certificate of lawful use for 10 caravans and 15 camping pitches. This provides an overall consented number of 110 pitches across both sites, which extend to around 12ha.
- 1.5 The application at Cae Du and Cae Canol Campsite in Beddgelert forms part of a wider visitor recreation masterplan for Beddgelert, prepared jointly by the applicant, Roberts Group and Forest Holidays, the owners of Forest Holidays in Beddgelert. The visitor recreation masterplan includes two separate planning applications; this one at Cae Du/Cae Canol by Roberts Group and the second at Forest Holidays.
- 1.6 The aim of the visitor recreation masterplan is to develop and enhance the tourist accommodation provision within the village of Beddgelert by expanding the provision of holiday cabins at Forest Holidays, in lieu of existing touring caravan and camping pitches, and improving and expanding the provision of touring caravan and camping pitches at Cae Du and Cae Canol. This would ensure that expanding the holiday cabins at Forest Holidays would not lead to an overall loss of touring caravan and camping

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pitches in the village, as additional pitches would be proposed at Cae Du and Cae Canol campsite.

- 1.7 The visitor recreation masterplan would also seek to improve and upgrade the multi-user route which runs alongside Forest Holidays, into Beddgelert.
- 1.8 The proposals at both sites seek to deliver significant environmental improvements by way of landscape planting and biodiversity enhancement.
- 1.9 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 threshold.
- 1.10 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'.
- 1.11 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.
- 1.12 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.
- 1.13 This Design, Access and Planning Statement identifies the context of the application site and its surroundings, describes the proposed development, sets out the relevant

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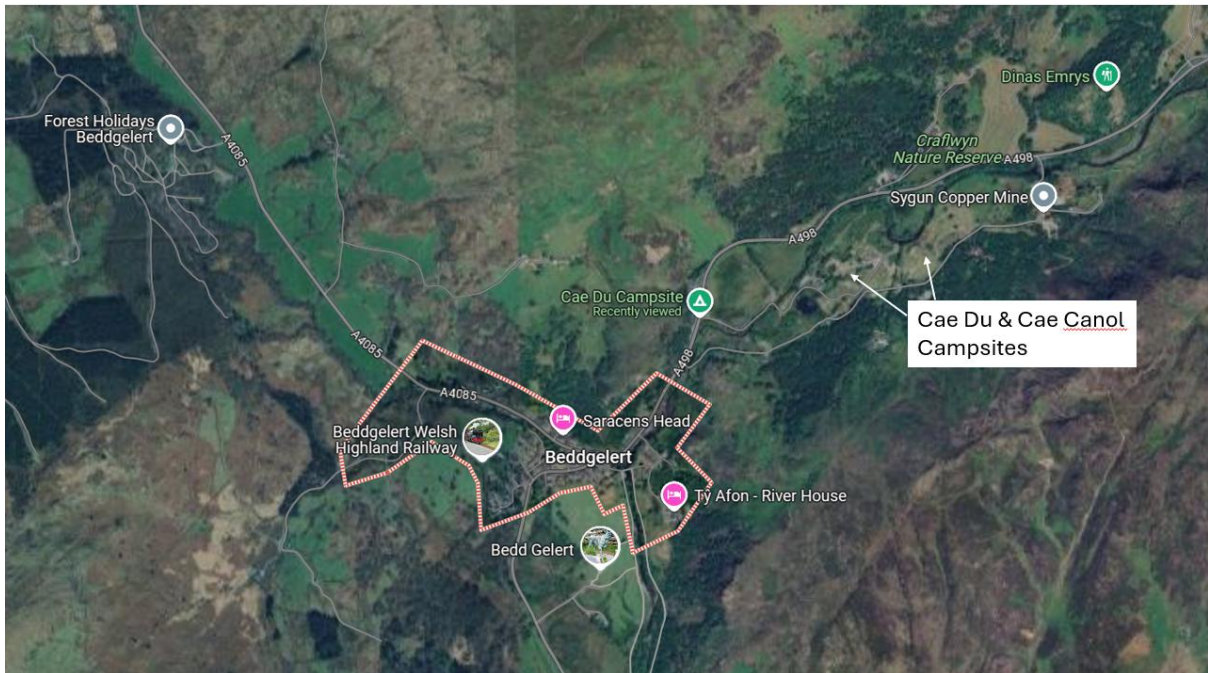
planning policy and guidance, and discusses the main considerations of the proposed development.

- 1.14 The adopted development plan consists of the Eryri Local Development Plan (LDP), which was adopted in 2019.

## 2. The site and context

- 2.1 The application site comprises of two existing campsites; known as Cae Du Camping Site and Cae Canol, located to the north-east of Beddgelert, on the approach into the village from Nant Gwynant. Cae Du forms the western part of the application site and Cae Canol forms the east part.
- 2.2 The location of Cae Du and Cae Canol are identified in Figure 2.1 in the context of the village of Beddgelert and Figure 2.1 identifies the extent of Cae Du and Cae Canol. The application site, as well as the surrounding local area, lies within Eryri National Park Authority area.

**Figure 2.1 Aerial image identifying the location of Cae Du and Cae Canol Campsites in the context of the local area and the village of Beddgelert**

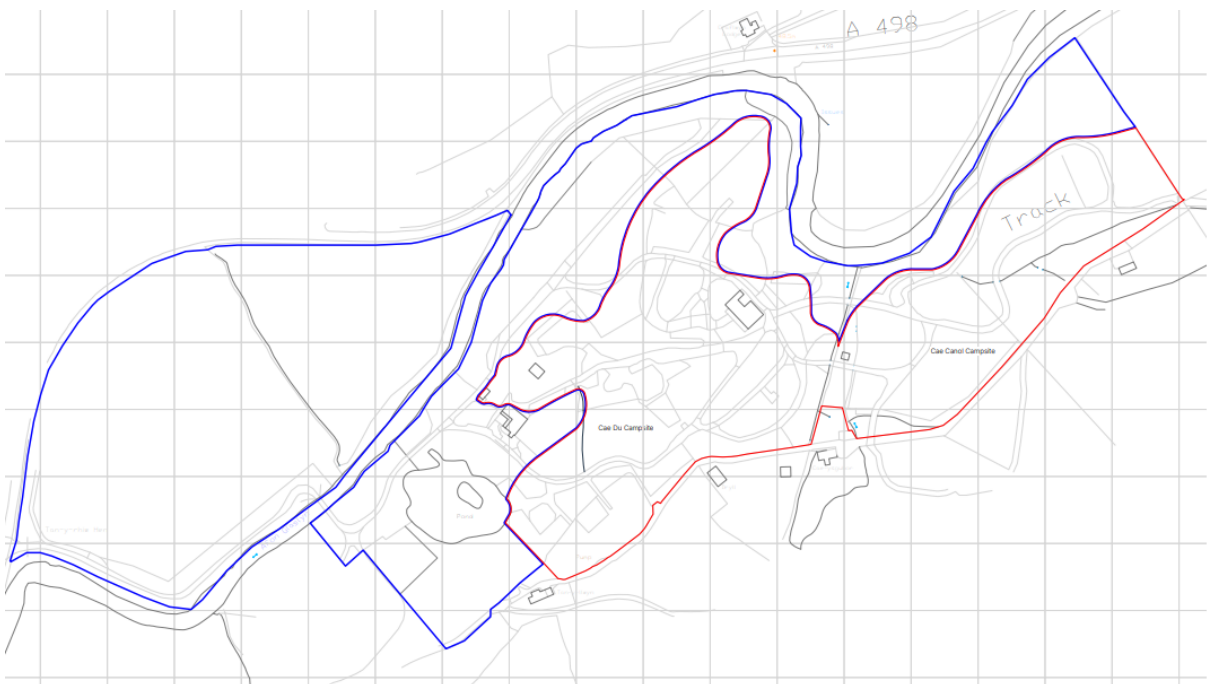


**Figure 2.2 Aerial Image identifying the location of Cae Du and Cae Canol Campsites**



2.3 The extent of the application site for the application is as show in Figure 2.3.

**Figure 2.3 Extract of location plan showing application site in red and land within the applicant's control in blue**



2.4 Afon Glaslyn runs along the northern boundary of Cae Du and Cae Canol Campsites. The application site has been drawn to exclude areas of flood risk and is positioned away from Afon Glaslyn.

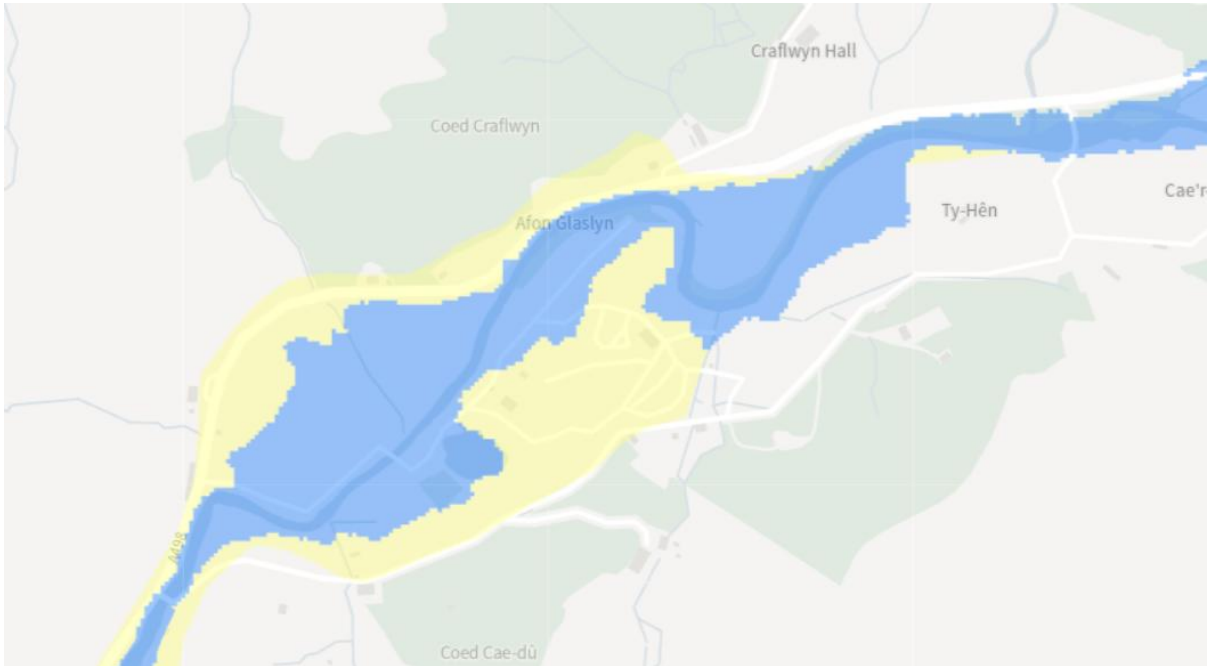


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- 2.5 Vehicular access into the site is provided via an existing access from the A498 which lies to the north of the site on the opposite side of the Afon Glaslyn. The existing vehicular access is from the west. The existing access track crosses over the Afon Glaslyn and provides access into Cae Du Campsite. Access is only then provided internally to Cae Canol. A single lane access road runs along the site's southern boundary, which provides vehicular access for properties and is also popular with walkers and cyclists, as it provides a connection between Beddgelert to the south-west and Nant Gwynant to the north-east. There is a Public Right of Way (PRoW) to the east of Cae Canol.
- 2.6 The application site, as well as the wider area of Eryri National Park lies within an International Dark Sky Reserve. Land to the north of the application site, on the opposite side of the A498 is one of three darker 'core' areas of the International Dark Sky Reserve which have the darkest skies and are in the remotest parts of the National Park.
- 2.7 Land to the south of the application site is identified as an 'Area of Natural Beauty' which include extensive tracts of unenclosed uplands, heather and moorland and semi natural mountain grassland.
- 2.8 Craflwyn Hall and Nature Reserve is a registered National Trust Park and Garden to the northeast of the site. The ancient monument of Dinas Emrys (meaning "fortress of Ambrosius") is a rocky wooded hillock above the Afon Glaslyn further to the north-east of the site, where a castle once stood that is thought to have been erected by the Welsh Prince Llywelyn ein Llyw Olaf (Llywelyn the Last).
- 2.9 Three SSSI / SAC sites are located nearby: Coedydd Beddgelert a Cheunant Aberglaslyn to the west and Coedydd Nantgwynant and Eryri to the east. There is an Ancient Woodland to the south of the site.
- 2.10 Parts of the application site (Cae Du) lie within a C2 flood risk area (blue) whilst the remainder of Cae Du lies in a Zone B area (areas known to have flooded in the past - yellow). Parts of the application site which form Cae Canol are in a C2 flood risk area. The extent of the flood risk areas from the Development Advice Maps are identified in Figure 2.4.

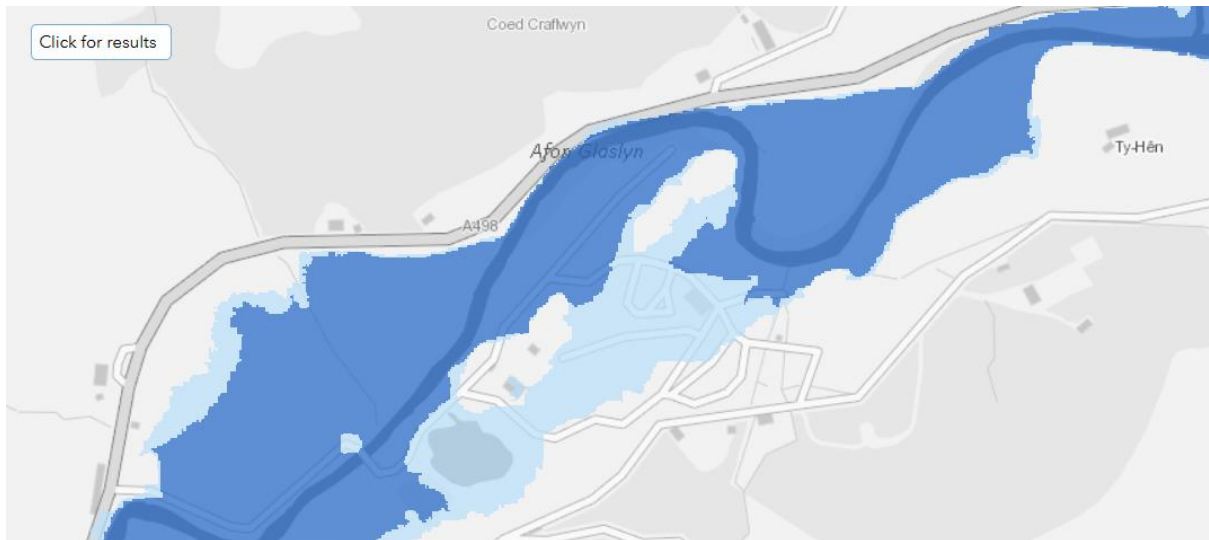
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**Figure 2.4 Extent of the flood risk areas from the Development Advice Maps**



The updated Flood Map for Planning advises that the extent of the C2 flood risk area broadly reflects that of Flood Zone 3 (dark blue) and other parts of the site are identified as Flood Zone 2 (light blue) as shown in Figure 2.5.

**Figure 2.5 Extract of Flood Map for Planning**

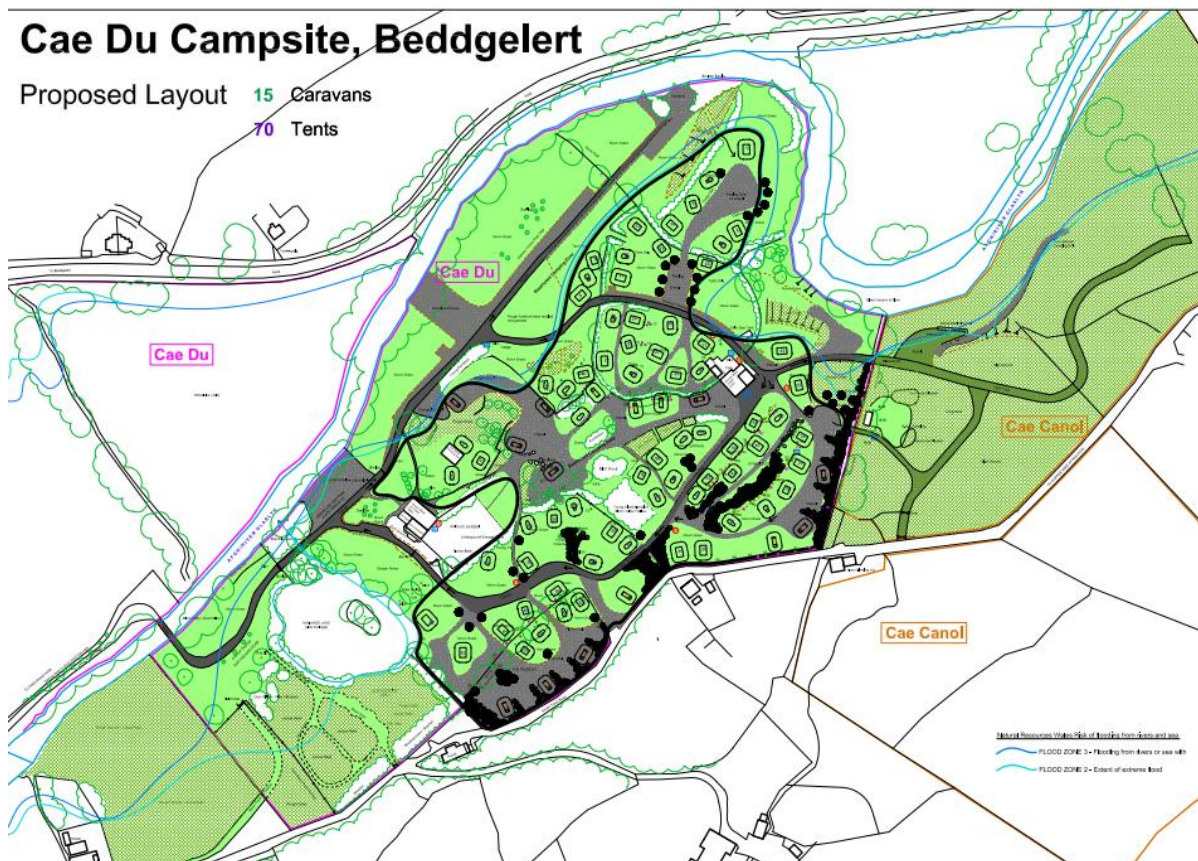


## Planning history

### Cae Du Campsite

2.11 The ad-hoc way that the Cae Du site has been developed over the years was consolidated into a single permission referenced NP2/11/679A. This permission dated 14 August 2014 established the lawful use of the site for the siting of no more than 70 tents and no more than 15 touring caravans. It also established that the site should only be used between March 1st and October 31st in any year. The approval was accompanied by a site layout indicating the location of the individual pitches, hook-ups, hard standings and the internal road layout, copy provided in Figure 2.6.

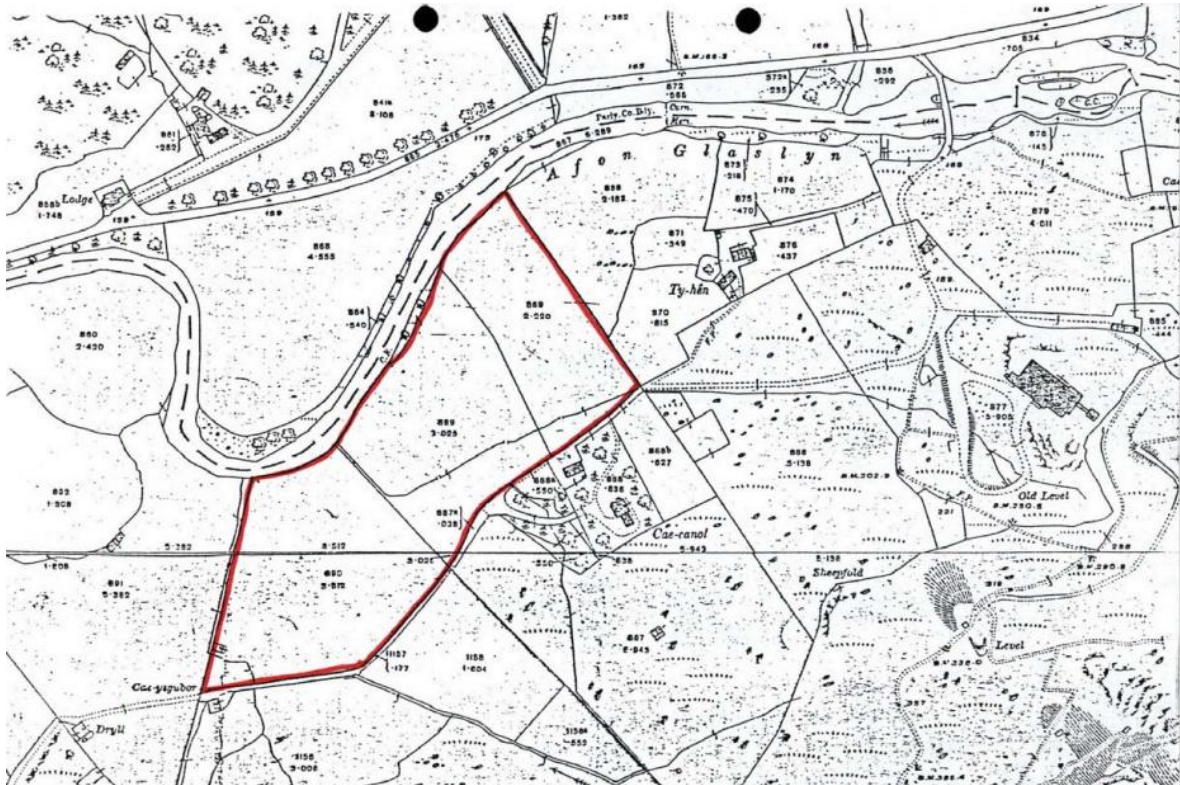
**Figure 2.6 Copy of approved site layout plan for Cae Du (NP2/11/679A)**



### Cae Canol campsite

2.12 Certificate of lawful use NP2/11/LU34D granted a certificate for up to 10 touring caravans and 15 tents between 1st March and 31st October inclusive of any calendar year providing a total of 25 pitches. A copy of the extend of the area associated with the lawful use is provided in Figure 2.7.

Figure 2.7 Location plan identifying the extent of the area associated with lawful use certificate NP2/11/LU34D



### 3. The proposed development

#### Background

3.1 The applicant, Roberts Group, has collaborated with Forest Holidays (applicant for a proposal at Forest Holidays), to develop a Visitor Recreation Masterplan involving both Cae Du and Cae Canol campsite and Forest Holidays sites, which would support the local tourism economy of the village of Beddgelert in a way that aligns with the thrust of the Gwynedd & Eryri 2035 Sustainable Visitor Economy Plan. Figure 3.1 provides an overview of the Visitor Recreation Masterplan for both Cae Du/Cae Canol and Forest Holidays.

*Figure 3.1 Visitor Recreation Masterplan for both Forest Holidays and Cae Du/Cae Canol*



3.2 Due to the success of the cabins, both for Forest Holidays and the local economy, Forest Holidays wish to expand the provision of cabins on site. In order to accommodate further cabins, these would replace existing touring and camping pitches within the site.

3.3 The Cae Du and Cae Canol site requires significant investment to bring the site up to modern day standards and provide the same high-quality offering to its visitors that the

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Roberts Group provide on all of their other existing sites. In order to make that investment viable, Roberts Group wish to increase the number of touring and camping pitches at the site. In this regard, both Roberts Group and Forest Holidays have been working together to rationalise but preserve the two distinctively different overnight offerings available at Beddgelert, so that each business can concentrate on their core activities.

- 3.4 The submitted Visitor Recreation Masterplan provides a schematic overview of the proposal including opportunities to improve pedestrian and cycling access into the village as well as providing significant benefits in terms of landscaping and biodiversity enhancement to green infrastructure networks.
- 3.5 It has been clear that the lack of provision of touring and camping pitches at Cae Du and Cae Canol over three consecutive seasons due to lack of trading by the previous owner has had a detrimental impact on the vibrancy and support for businesses in the village of Beddgelert.
- 3.6 Whilst expanding the provision of cabins at Forest Holidays would continue to support the local economy leading to spin-off spending within businesses in Beddgelert, the spin-off spending from visitors staying in touring caravans and camping pitches differs from those staying in cabins. Therefore, in order to retain the economic benefits from touring and camping pitches for the benefit of the village and its businesses, it is proposed to increase the touring and camping pitches Cae Du and Cae Canol. This would retain the economic spin-off spending benefits from visitors of the touring and camping pitches within the village, whilst replacing the touring and camping pitches with additional cabins at Forest Holidays.

## Use, amount, scale and layout

- 3.7 This application relates to proposals to enhance tourist accommodation and facilities at Cae Du Campsite to deliver overall improvements to the site by way of expanding the campsite at Cae Du into Cae Canol, relinquishing the lawful use at Cae Canol, which would enable the delivery of overall environmental, biodiversity and landscape improvements, as well as improving the facilities at the site by way of providing two new toilet blocks to serve the site.

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- 3.8 The existing 110 consented touring and camping pitches at Cae Du and Cae Canol can be operational between 1st March to 31st October in any one year. The 25 consented pitches at Cae Canol partly lie within Flood Zone C2 and Flood Zone 3.
- 3.9 The proposed expansion of Cae Du Campsite into the Cae Canol field and relinquishing the lawful use for 25 touring and camping pitches at Cae Canol enables the relocation of those 25 lawful pitches to areas which are at a much lesser risk of flooding.
- 3.10 It is proposed to revise the layout of touring and camping pitches at Cae Du, so as to move pitches away from the flood risk areas. The reconfiguration of the layout of the Cae Du site as well as the extended site area into Cae Canol has been landscape led, seeking to deliver overall improvements in terms of the siting of pitches, introduction of landscape planting to offer screening, as well as the delivery of a comprehensive scheme of biodiversity enhancement across the site.
- 3.11 The proposed development would see the number of touring/camping pitches positioned within the existing Cae Du part of the site increase from 85 to 151 and the number of pitches within the Cae Canol part of the site increase from 25 to 86, providing a total of 237 pitches. It is proposed for the operating season at Cae Du/Canol to be extended to enable operation all-year round, however, this matter is still being discussed with the Local Planning Authority.
- 3.12 An extract of the proposed site layout plan is provided in Figure 3.2.

**Figure 3.2 Extract of proposed site layout plan**



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- 3.13 The proposed reconfiguration of existing and additional touring and camping pitches at Cae Du have been led by the desire to relocate existing touring and camping pitches from areas close to the riparian edge and away from areas of flood risk. The reconfigured layout of the pitches has worked around existing landscaping features within the site ensuring that each pitch provides a minimum distance of 6m between each unit and a minimum of 4m between a vehicle associated with the pitch and the neighbouring unit. Details of a typical multi-user pitch with allocated parking is provided on the masterplan.
- 3.14 The proposals within the Cae Du part of the site incorporate enhancements to the existing campsite by way of new habitat and planting to increase the biodiversity offer of the site.
- 3.15 The proposals at the Cae Canol part of the site would see the introduction of new internal access roads to serve the reconfigured site layout and additional pitches, which has been led by a comprehensive landscaping approach to planting and screening that will not only increase biodiversity and climate resilience on the site, but will also protect views of the surrounding landscape. At present, the lawful use for 25 touring and caravan pitches at Cae Canol is in an area which adjoins the river and is at risk of flooding. The proposals for the layout of the Cae Canol part of the site would see touring and camping pitches located away from the riparian edge to areas away from the risk of flooding, and enabling the land close to the river to incorporate recreational and biodiversity improvements.
- 3.16 The proposals would incorporate a new riverside walk within land within the applicant's ownership running from the western side of the Cae Du part of the site, along the river, linking to an existing riverside picnic area and through into Cae Canol around to the eastern part of the site. This provides the opportunity to incorporate ecological interpretation along the walk.
- 3.17 The proposals would also include the erection of two new stone built traditional buildings to provide toilet facilities to serve the users of the site.

## Access

- 3.18 Vehicular access to the site is provided from the existing access from the A498 to the west. No alterations are proposed to this means of access.



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- 3.19 Vehicular access within the site would then be confined to the internal access road, with additional new pedestrian walking routes provided, including a riverside walk as detailed above. The proposals also offer pedestrian links at the eastern corner of the site at the far end of Cae Canol, enabling pedestrian access to the Cambrian Way which leads to tourist attractions such as Sygun Copper Mine, Dinas Emrys Hill, Craflwyn Hall, Craflwyn Nature Reserve, Llyn Dinas, as well as Nant Gwynant to the north-east and the village of Beddgelert to the south-west

## Landscaping

- 3.20 The landscape proposals are for enhancements to the existing campsite at Cae Du, including new habitat and plantings to increase the biodiversity offer on the site. Cae Canol is to include a more comprehensive approach to planting and screening that will not only increase biodiversity and climate resilience on the site but will protect views of the distant mountains whilst screening near and middle ground views of campsites. The strategy is to offer some privacy and intimate spaces for campers and still allow passersby to the north and south to enjoy views of the surrounding hills.
- 3.21 Cae Du is the focus of reseeding and enhancement of existing green infrastructure offer. The plant palette is native and pollinator friendly species to encourage the highest possible wildlife benefit to site and blend seamlessly with the wider Eryri ecological grid.
- 3.22 Cae Canol is the focus of extensive replanting and enhancement of the existing of biodiversity offer. The plant palette is native and pollinator friendly species to encourage the highest possible wildlife benefit to site and blend seamlessly with the wider Eryri ecological grid. The plantings will also assist in screening the site and providing privacy for visitors to the campsite.

**Figure 3.2 Extract of proposed landscaping plan with details of key ecological enhancements**



3.23 The proposed reseeding strategies for wet meadows and acid grasslands, hedgerow and woodland enhancements, tree and shrub planting will strengthen existing connectivity to nearby woodland and river corridor and also strengthen the existing connectivity for faunal dispersal and foraging potential in the local area, it also links in with Local Ecological Networks.

3.24 Provision of trees, shrub and hedgerows will strengthen and increase bird and bat foraging opportunities and the addition of bat and bird boxes will increase the roosting and nesting availability on site.

3.25 Provision of enhanced meadow and grassland, hedgerow, tree and shrub planting and hibernacula will provide foraging, commuting and refuge habitat for amphibian, small mammals and invertebrates.

## Appearance

3.26 Two new buildings are proposed as part of the development comprising of two new toilet blocks. These would be designed to reflect the appearance of a traditional stone built building with a traditional slate roof, reflective of traditional buildings of agricultural nature in the rural setting of the National Park.

## 4. Policy context

4.1 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

4.1 This development relates to a holiday cabins, touring caravan and camping site and relevant national planning policy is set out in:

- Planning Policy Wales (PPW) Edition 12, (2024);
- Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities;
- TAN 12: Design;
- TAN 13: Tourism;
- TAN 18: Transport;
- TAN 20: Planning and the Welsh Language;
- TAN 23: Economic Development.

4.2 Relevant national planning policies are listed in table 4.1.

**Table 4.1 Summary of national planning policy and guidance**

Policy	Summary of policy
PPW: Chapter 5: Productive and Enterprising Places	<p><b>Economic Development</b> For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes.</p> <p>Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.</p> <p><b>Tourism</b> Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.</p> <p>The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism.</p>

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		Planning authorities should adopt positive approaches to proposals which utilise previously developed or disused land and water bodies for tourism uses.
TAN Design	12	The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales. Paragraph 5.5.1 of TAN 12 identifies that an understanding of landscape and townscape quality, including its historic character, is fundamental to the design process.
TAN Tourism	13	TAN provides guidance on tourism related issues in planning including matters relating to hotel development and recognises that hotel development can bring benefits for the local community to support amenities and activities for residents and tourists. It is guided that hotel development should be compatible with neighbouring uses.
TAN Transport	18	<p>The main aim of TAN 18 is ensuring that new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.</p> <p>Paragraph 2.4 of TAN identifies that the inter-relationship between land use planning and transport is complex and varied. The development of land is dependant, in part, upon transport infrastructure and services to function efficiently. By influencing the location, scale, density and mix of land uses and new development, land use planning can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.</p> <p>TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, in particular ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p>
TAN Planning and the Welsh Language	20	<p>TAN 20 provides guidance on the consideration of the Welsh language as part of the Local Development Plan making process.</p> <p>In determining individual planning applications and appeals where the needs and interests of the Welsh language may be a material consideration; decisions must, as with all other planning applications, be based on planning grounds only and be reasonable. Adopted development plan policies are planning grounds, including those which have taken the needs and interests of the Welsh language into account.</p>
TAN 23 Economic Development		<p>TAN 23 also provides guidance on matters relating to economic development and recognises the diverse range of employment uses that are present in the economy in Wales.</p> <p>Paragraph 1.2.1 advises that <i>“the economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development”</i>.</p> <p>Section 2.1 relates to the weight to be given to economic benefit. Paragraph 2.1.1 advises that it should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively</p>

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	<p>and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.</p> <p>Paragraph 2.1.2 advises that where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary. There will of course be occasions when social and environmental considerations will outweigh economic benefit. The decision in each case will depend on the specific circumstances and the planning authority's priorities.</p>
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### Building Better Places (July 2020)

- 4.3 In July 2020, the Welsh Government issued the document Building Better Places: The Planning System Delivering Resilient and Brighter Futures.
- 4.4 The document emphasises the importance for the consideration of health and well-being throughout the planning system of Wales.
- 4.5 The document sets out ways in which future development and the planning system must move forward following the significant impact that Covid-19 has had on communities. It emphasises the importance of:
- reawakening Wales' tourism and cultural sectors,
  - creating neighbourhoods,
  - exercise and rediscovered transport methods,
  - green infrastructure, health and well-being and ecological resilience.
- 4.6 The document recognises that the planning system must ensure the chosen locations and resulting design of new developments support sustainable travel modes and maximise accessibility by walking and cycling. New development should improve the quality of place and create safe, social, attractive neighbourhoods where people want to walk, cycle and enjoy.
- 4.7 Building Better Places recognises that during this time we have also seen a renaissance of local service provision from smaller retailers or businesses, in both rural and urban areas; this entrepreneurial spirit should be recognised and supported by the planning system.
- 4.8 The planning system strongly supports a diverse, sustainable tourism and culture industry. It brings jobs and income into Wales, and it enables people worldwide to enjoy and experience Welsh hospitality, landscape and culture. It is important that any new

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investment works with our cultural and historic assets to maximise benefits and positively contribute to sustainable development.

- 4.9 Cultural and historic assets can help attract and complement investment into our communities. The document recognises that it is important that any new investment works with our cultural and historic assets to maximise benefits and positively contribute to sustainable development.

### Local planning policy and guidance

- 4.10 The adopted development plan consists of Eryri Local Development Plan (LDP), which was adopted in February 2019. Table 4.2 provides a summary of local planning policy which is of relevance to the proposed development.
- 4.11 The adopted Eryri LDP provides two key objectives in supporting a sustainable rural economy within Snowdonia National Park. These are:
- Encourage sustainable economic growth by supporting a rural economy that provides employment opportunities and maintains thriving communities; and
  - Support tourism and outdoor recreation which maximise local economic benefits, minimise environmental impact and are in sympathy with the ‘Special Qualities’ of the National Park.
- 4.12 It is considered that the proposed development would embody the spirit of these objectives, as it would support an existing rural business within the National Park with minimal impact upon the environment, would support employment of local people, and would help to support tourism within the National Park and within the whole of North Wales.

**Table 4.2 Summary of local planning policy and guidance**

Policy	Summary of policy
Strategic Policy A: National Park Purposes and Sustainable Development	The LDP seeks to ensure that new development promotes the principles of sustainable development in ways which further National Park purposes and duty whilst conservation and enhancing the National Park’s ‘Special Qualities’. Proposals which compromise National Park purposes will be refused. There are a number of considerations listed that should be taken into account.
Development Policy 1: General	There are certain broad requirements which all development should meet if it is to be acceptable within the National Park. Proposals must be acceptable in terms of their impact on the landscape, natural environment and cultural heritage, opportunities for understanding and enjoyment,

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Development Principles	quality and design, sustainable use of resources, amenity, highway safety, flood risk and infrastructure. Development Policy 1 sets out an important context for the topic-based policies contained in the Eryri LDP.
Strategic Policy D: Natural Environment	The natural resources, biodiversity, geodiversity and 'Special Qualities' of the Snowdonia National Park will be protected from inappropriate development. Where development is deemed acceptable developers will be expected to ensure that the natural environment is protected and enhanced. Proposals should not adversely affect the National Park's biodiversity resources including designated sites from an international through to a local level, as well as wider biodiversity resources e.g. habitats and species outside designated sites
Development Policy 2: Development and Landscape	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. Unacceptable impacts on the landscape will be resisted and particular regard will be had to the protection of: i. The Snowdonia Dark Skies Reserve, in particular Core Areas. ii. The Dyfi Biosphere Reserve. iii. Section 3 areas of natural beauty. iv. Undeveloped coast. v. Panoramas visible from significant viewpoints. vi. Sensitive Landscape Character Areas as defined in the Supplementary Planning Guidance documents the Landscapes of Eryri and the Landscape Sensitivity and Capacity Assessment.
Development Policy 6: Sustainable Design and Materials	With regard to National Park setting and the Authority's commitment to social inclusion, development proposals will be required to take into consideration the following: i. Inclusive design ii. Landscape protection and enhancement iii. Biodiversity protection and enhancement iv. The Historic Environment v. Environmental sustainability vi. Cultural identity vii. An Integrated energy statement Natural Welsh mineral roofing slate or an approved equivalent material with the same colour, texture and weathering characteristics will be required on new buildings and extensions.
Chapter 6. Supporting a Sustainable Rural Economy	SNPA's objective in terms of the rural economy is to "Encourage sustainable economic growth by supporting a rural economy that provides employment opportunities and maintains thriving communities. Support tourism and outdoor recreation which maximise local economic benefits, minimise environmental impact and are in sympathy with the 'Special Qualities' of the National Park."
Strategic Policy H: A Sustainable Rural Economy	In order to create and retain a sustainable rural economy, SNPA will: Safeguard existing key employment sites at Bala, Dolgellau and Harlech. Support new employment and business development and the retention of existing employment the local service centres, service settlements and secondary settlements. The nature and scale of the development must be commensurate with the settlement's size and function.

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	<ul style="list-style-type: none"> <li>i. Promote the re-use of underused or redundant land or buildings for economic or employment purposes.</li> <li>ii. Support the agricultural sector and opportunities for rural diversification that do not negatively impact on the ‘Special Qualities’ of the National Park.</li> <li>iii. Support tourism and recreation activity which maximise local economic benefits, minimise environmental impact and safeguard the ‘Special Qualities’ of the National Park.</li> <li>iv. Encourage proposals which would provide appropriate supportive infrastructures to sustain and promote the local economy.</li> <li>v. Support live-work units and home working.</li> </ul>
<p>Strategic Policy I: Tourism</p>	<p>Tourism has been a traditional industry in Eryri and the surrounding seaside resorts for at least two centuries.</p> <p>Through tourism it is possible to achieve one of the statutory purposes of the National Park; that is to promote opportunities for the understanding and enjoyment of the ‘Special Qualities’ of the National Park. The Authority aims to encourage sustainable tourism and ecotourism, maximising economic and employment benefits while safeguarding the environment as well as the interest of the local communities.</p> <p>Sustainable tourism is any form of development, management or tourist activity which ensures the long-term protection and preservation of natural, cultural and social resources and contributes in a positive and equitable manner to the economic development and well-being of individuals living, working or staying in protected areas.</p> <p>In order to create and retain sustainable or eco-tourism within the National Park and extend the visitor period while protecting and enhancing the landscape of the National Park and its special qualities the Authority will:</p> <ul style="list-style-type: none"> <li>i. Support tourism and recreation development that is based on the principles of sustainable tourism.</li> <li>ii. Identify and promote areas of the National Park that attract visitors while ensuring that the ‘Special Qualities’ of the National Park are not affected.</li> <li>iii. Promote sustainable modes of transport for visitors to and from the National Park.</li> <li>iv. Support the accommodation industry by encouraging the improvement of the sustainability and quality of existing visitor accommodation.</li> </ul>



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	<p>v. Encourage proposals which will promote the opportunity for the public understanding and enjoyment of the 'Special Qualities' of the National Park including proposals that will assist disabled people.</p>
<p>Development Policy 18: The Welsh language and the Social and Cultural fabric of communities</p>	<p>Advises that the needs and interests of the Welsh language will be taken into account when determining all planning applications within the National Park.</p> <p>This will be achieved through:</p> <ul style="list-style-type: none"> <li>i. Supporting development which maintains or enhances the integrity of the Welsh language.</li> <li>ii. Refusing development which, due to its size, scale or its location, would cause significant harm to the character and language balance of a community. To be able to make an informed decision on applications that may have an effect on the future of the Welsh language within communities, applicants will be required to submit a: <ul style="list-style-type: none"> <li>a) 'Community and Linguistic Statement' to accompany a planning application for unanticipated windfall sites of 5 or more residential units; a commercial, industrial or tourist development with an area of 1000m<sup>2</sup> or more; a development which is likely to lead to the loss of community facilities or employment opportunities and a tourism development creating ten or more holiday units.</li> <li>b) More detailed assessment in the form of a 'Community and Linguistic Impact Assessment' to accompany a planning application where developments are on a larger scale. Larger developments in this case are regarded as proposals which are substantially above the thresholds outlined in criterion (a) and are likely to be located on unallocated sites, have some significance beyond the National Park boundary and be unrelated to specific policies in the Plan.</li> </ul> </li> <li>iii. Mitigating against any adverse effect through requiring, in appropriate circumstances a financial contribution through a Section 106 agreement.</li> </ul> <p>Support will be given for development which maintains or enhances the integrity of the Welsh language and refusing development which due to its size, scale or its location would cause significant harm to the character and language balance of a community.</p> <p>The policy encourages the use of Welsh place names for new development, house and street names.</p>
<p>Development Policy 23: Touring and Camping Sites</p>	<p>Within the National Park no new touring or camping sites will be permitted. The extension or upgrading of existing touring caravan and camping sites, will be permitted providing all of the following criteria are satisfied:</p> <ul style="list-style-type: none"> <li>i. The site is already well screened from public vantage points, and / or there would be a reduction of its impact on the surrounding landscape.</li> <li>ii. The scale and layout of the extension or upgrading is appropriate within the landscape.</li> </ul>

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	<ul style="list-style-type: none"> <li>iii. The proposal protects and where appropriate enhances natural heritage interests.</li> <li>iv. The proposal will significantly improve the internal landscaping of a site and increase the quality of the existing facilities, or develop new high quality facilities.</li> <li>v. The proposal is in keeping with the size of the existing site.</li> </ul> <p>The replacement of camping pitches with other non-camping pitches will not be permitted.</p>
<p>Touring caravans Para 6.41</p>	<p>The Authority may support the extension or upgrading of existing touring caravan and camping sites including an increase in the number of pitches but only where they are well screened and where there is an overall landscape improvement. They will need to be of a scale and form that is compatible with the setting and capacity of the area in which they are proposed.</p>
<p>Tourist accommodation Para 6.38</p>	<p>The National Park needs to maintain a good range of quality accommodation for visitors.</p>

- 4.13 Supplementary Planning Guidance (SPG) 8: Visitor Accommodation also provides additional guidance in relation to proposals relating to touring and camping sites advising that the purpose of Development Policy 23 of the Eryri LDP is to secure improvements to existing sites within the National Park, not to allow the creation of new sites. These improvements include both environmental and internal landscaping improvements to the site. The main aim of the policy is however not to allow for the increase in numbers of pitches on existing sites but to improve existing facilities and to minimise any impacts on the environment. An increase in the number of pitches will only be permitted on appropriate sites where there are significant environmental improvements proposed and a reduction in impact on the surrounding landscape. The Authority will have to be satisfied that the overall improvements to the site are significant enough to warrant the increase in pitch numbers.
- 4.14 Sites which are seeking an extension already need to be well screened from main public viewpoints and the scale of any increase in pitches should be appropriate with its surroundings and in keeping with the size of the existing site. Extensions must be physically attached to the existing site. Improvements could include the moving of existing pitches to another part of the site that is better screened within the landscape setting or by providing additional new screening on the boundary and within the site.
- 4.15 The Authority will require a detailed plan to a professional standard of the existing and proposed internal landscaping improvements as part of the extension or upgrading proposals.

## 5. Main considerations

- 5.1 The main considerations in relation to this application are as follows, and are then discussed in detail:
- Principle of development;
  - Economic benefits;
  - Social benefits;
  - Biodiversity;
  - Impact on landscape and trees;
  - Green Infrastructure;
  - Welsh language and culture; and
  - Drainage.

### Principle of development

- 5.2 The adopted Eryri Local Development Plan (LDP) provides two key objectives in supporting a sustainable rural economy within Snowdonia National Park. These are:
- Encourage sustainable economic growth by supporting a rural economy that provides employment opportunities and maintains thriving communities; and
  - Support tourism and outdoor recreation which maximise local economic benefits, minimise environmental impact and are in sympathy with the ‘Special Qualities’ of the National Park.
- 5.3 It is considered that the proposed development would embody the spirit of these objectives, as it would diversify an existing rural tourism business within the National Park with minimal impact upon the environment, would continue to support a key employer of local people within the National Park, and would help to support tourism within the National Park and within the whole of North Wales.
- 5.4 Tourism has been a traditional industry in Eryri for at least two decades. Tourism enables the promotion of opportunities for understanding and enjoying the ‘Special Qualities’ of the National Park, which is one of the statutory purposes of the National Park.
- 5.5 Strategic Policy I: Tourism and Development and Policy 21: Tourism and Recreation support sustainable development proposals which do not adversely impact on the “special qualities” of the National Park.

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- 5.6 Strategic Policy I of the LDP specifically states that the Authority will seek to “*support the accommodation industry by encouraging the improvement of the sustainability and quality of existing visitor accommodation*”.
- 5.7 Cae Du and Cae Canol are two separate campsites within the National Park, although they have been in the same ownership and are operated alongside each other with facilities at Cae Du also serving Cae Canol.
- 5.8 Cae Du Campsite benefits from planning permission to operate as a touring and camping site with 85 pitches, whilst Cae Canol Campsite benefits from a certificate of lawful use for 25 touring and camping pitches. As the proposal relates to a touring and camping site, Development Policy 23 which relates to touring and camping sites is considered to be the most relevant policy.
- 5.9 The proposal would seek to deliver improvements to Cae Du and extend the Cae Du site into land which is known as Cae Canol, and therefore the proposal would be assessed as improvements and extension to an existing touring and camping site.
- 5.10 The policy seeks to support the extension and upgrading of existing touring caravan and camping sites subject to set criteria. The proposals involve increasing the number of touring and camping pitches together with a comprehensive site wide scheme of environmental, landscaping, biodiversity and visitor facilities improvements. The scheme would involve reconfiguring the existing layout of pitches at Cae Du, relocating pitches away from the riparian edge and areas of flood risk, as well as extending pitches into Cae Canol away from the riparian edge and flood risk areas, whilst relinquishing the lawful use for the 25 touring and camping units at Cae Canol.
- 5.11 The proposals are led by a comprehensive and strategic biodiversity, landscaping and green network improvement scheme across the site, incorporating land within the applicant’s control, but outside the existing site boundaries.
- 5.12 The extensive landscaping scheme would reduce the visual impact of existing pitches from public viewpoints, especially directly to the south of the site, which is well used by walkers and cyclists, and also includes residential properties.
- 5.13 Pre-application discussions with the Local Planning Authority (LPA) have acknowledged that there an opportunity here to secure environmental improvements across both Cae Du and Cae Canol, however, it is important that these improvements are substantial given the proposed increase in number of pitches.

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- 5.14 The improvements to Cae Du and Cae Canol comprise of environmental, biodiversity, landscape, green infrastructure networks and facilities as discussed below.

### Improvements in terms of risk of flooding

- 5.15 The overall site layout has resulted in reconfiguration of the location of pitches at Cae Du in order to relocate pitches away from the riparian edge and therefore areas of flood risk. All pitches have now been designed so as to be outside areas at risk of flooding. The letter in relation to flood risk does explain that some pitches would be excluded as camping pitches, due to risk from surface water flooding.
- 5.16 In terms of Cae Canol, at present the location of pitches is not controlled and touring and camping pitches can be sited anywhere with the extent of the lawful use, the vast majority of which lies in a C2 or Flood Zone 3 flood risk area.
- 5.17 The proposal would see Cae Du extend into Cae Canol with new pitches created away from the riparian edge and away from the areas of flood risk. The lawful use at Cae Canol would then be relinquished. This would deliver significant improvements to safety and reduce flood risk. This should carry weight as part of the assessment of improvements to be delivered.

### Biodiversity and landscaping

- 5.18 The landscape proposals are for enhancements to the existing campsite at Cae Du, including new habitat and plantings to increase the biodiversity offer on the site. Cae Canol is to include a more comprehensive approach to planting and screening that will not only increase biodiversity and climate resilience on the site but will protect views of the distant mountains whilst screening near and middle ground views of campsites. The strategy is to offer some privacy and intimate spaces for campers and still allow passersby to the north and south to enjoy views of the surrounding hills.
- 5.19 Cae Du is the focus of reseeded and enhancement of existing green infrastructure offer. The plant palette is native and pollinator friendly species to encourage the highest possible wildlife benefit to site and blend seamlessly with the wider Eryri ecological grid.
- 5.20 Cae Canol is the focus of extensive replanting and enhancement of the existing of biodiversity offer. The plant palette is native and pollinator friendly species to encourage the highest possible wildlife benefit to site and blend seamlessly with the wider Eryri

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ecological grid. The plantings will also assist in screening the site and providing privacy for visitors to the campsite.

- 5.21 The proposed reseeded strategies for wet meadows and acid grasslands, hedgerow and woodland enhancements, tree and shrub planting will strengthen existing connectivity to nearby woodland and river corridor and also strengthen the existing connectivity for faunal dispersal and foraging potential in the local area, it also links in with Local Ecological Networks.
- 5.22 Provision of trees, shrub and hedgerows will strengthen and increase bird and bat foraging opportunities and the addition of bat and bird boxes will increase the roosting and nesting availability on site.
- 5.23 Provision of enhanced meadow and grassland, hedgerow, tree and shrub planting and hibernacula will provide foraging, commuting and refuge habitat for amphibian, small mammals and invertebrates.
- 5.24 The creation of hardstanding pitches and access tracks will result in the loss of existing habitat on site, to an approximate extent of 6129sqm. The habitats that would be affected include semi-improved grassland and poor marshy grassland. The habitat creation as a result of the proposal would result in 31,682sqm of improved habitat, in addition to the planting of 276 individual trees and 57 linear metres of native hedgerow. The proposals would also deliver additional biodiversity enhancement by way of the installation of ecological features including 10 bat and bird boxes, ponds and scrapes to include dead timber and local stones, designed in a way to provide reptile refugia, and hibernacula.
- 5.25 The scheme therefore would deliver significant biodiversity enhancements that would enhance green infrastructure networks across the site.

### Landscape and visual impact

- 5.26 The application site and views of the proposed development are not clearly visible from the majority of the viewpoints assessed in the Landscape Appraisal, and even the close views are filtered by intervening trees without leaf cover. These views would be more negligible during summer months.
- 5.27 Three viewpoints are assessed as having a negligible or slight impact due to the site being screened by intervening topography.

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- 5.28 Two viewpoints are assessed as having a moderate impact, due to their proximity from the adjoining country lane/public footpath, and therefore there would be some impact. However, the landscaping proposals focus on mitigating these short range views by adding evergreen planting of shrubs and trees to provide effective screening in a short period of time, as well as providing privacy for campers.
- 5.29 Views of the proposed development from higher ground (PRoW above Sygun Copper Mine) is the only major impact identified and this view would be mitigated by the new proposed planting, which will help to screen those views. The effectiveness of the screening will only increase with time and maturity.
- 5.30 There would be a substantial enhancement in terms of biodiversity and habitat creation as well as access to nature, health and well-being benefits for people.
- 5.31 The additional pitches at Cae Canol will be seen in the context of the neighbouring Cae Du Campsite. However, there is currently lawful use for touring and camping use in Cae Canol.

### Recreational access and facilities

- 5.32 The proposals would incorporate a new riverside walk within land within the applicant's ownership running from the western side of the Cae Du part of the site, along the river, linking to an existing riverside picnic area and through into Cae Canol around to the eastern part of the site. This provides the opportunity to incorporate ecological interpretation along the walk.
- 5.33 The proposals would also include the erection of two new stone built traditional buildings to provide toilet facilities to serve the users of the site. These buildings have been designed so as to reflect a traditional appearance of rural outbuildings in the National Park.
- 5.34 It is considered that the overall improvements proposed as part of the proposed development would ensure that the proposal complies with the requirements of Policy 23 of the Eryri LDP.
- 5.35 The proposal also seeks to extend the operating season at Cae Du and Cae Canol to all-year round. Pre-application discussions with the Local Planning Authority based on guidance provided in paragraph 14.1 of SPG 8 which advises that:

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“Consideration will be given to the extension of the season on touring sites for caravans that are on tour, providing the site is already well screened. Existing screening by mixed deciduous and evergreen trees will be a particularly important consideration in this instance to ensure that the site is well screened throughout the year. Where there would be an increase in the impact on the landscape during the winter months the application would not be looked upon favourably”.

- 5.36 The application is accompanied by a Landscape Appraisal which assesses the potential impact of the proposal on landscape and visual impact. Further discussions will be undertaken with the Local Planning Authority regarding the proposals to extend the operating season.

### Economic benefits

- 5.37 A thriving and diverse local economy where sustainable tourism and other forms of employment in a working countryside complement agriculture-related activities is one of the Welsh Government’s priorities for rural areas.
- 5.38 TAN 6 states that “...*the overall goal for the planning system is to support living and working rural communities in order that they are economically, socially and environmentally sustainable*”.
- 5.39 PPW advises that the economic benefits of development are material considerations when determining planning applications.
- 5.40 The economic benefits of holiday parks and campsite sector in Wales is clearly demonstrated in recent figures published by UKCCA in their ‘Pitching the Value: 2024 Economic Benefit Report: Holiday Parks and Campsites Wales’ (February 2024). The recent publication notes that in 2022/23 it is estimated that the Welsh holiday park and campsite sector generated a gross direct visitor expenditure impact of £1.66bn in the economy. This visitor expenditure supports 30,726 FTE jobs and contributes £945.9m (including multipliers) of GVA to the economy. In addition to the figures above, money spent on maintenance by tourers and holiday caravan owners adds a further £92.8m of expenditure to the Welsh economy.
- 5.41 The ‘Pitching the Value: 2024 Economic Benefit Report: Holiday Parks and Campsites Wales’ Report notes ways in which holiday parks and campsite operators support their local communities through:



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- expenditure – 31% from the total survey sample cumulatively spent £13.4m per year in capital expenditure, operating expenditure, wages and salaries
- local community engagement – including hosting community events, promoting local business and causes, and fundraising for charities
- environmental activities – including support for recycling and biodiversity, water and energy conservation initiatives, renewable energy adoption and participation in the Green Tourism award scheme
- health and wellbeing – including providing cycle paths, promotion of wider community health and fitness sessions and healthy food options provided on-parks

5.42 The application is accompanied by an Economic Impact Assessment report. It identifies that the tourism industry is a core industry in Wales, being more important to the local economy in Wales than any other part of the UK, accounting for 4.9% of its economic output, compared to 3.7% as the UK average. Wales has some of the UK's most tourism-dependent local authorities, which includes Gwynedd, Anglesey and Conwy. Tourism contributes £6.9bn to the wider Welsh economy and supports almost a quarter of a million FTE jobs.

5.43 Tourism is also a key employer in the Gwynedd area. Prior to the Covid 19 pandemic, the economic value of the sector was estimated at circa £1.4B, with c18,200 people working in the field. The value of the sector dropped significantly during the pandemic but the latest STEAM data report for 2022 evidences that the sector has largely returned to pre-pandemic levels. The following provides a summary of the statistics in relation to Gwynedd:

- Value to the economy (income) £1.5B (+23% on 2021)
- Number of FTE jobs 17,737 (+21% on 2021)
- Number of visitors 7.9M (+33% on 2021)
  - Number of day visitors 3.8M (+24% on 2021)
  - Number of staying visitors 4.1M (+43% on 2021)
- Number of overnight stays 20.4M (+32% on 2021)
- Average visit duration 5.0 nights

5.44 The Economic Impact Report identifies current trends in the tourism market as follows:

- Overseas residents' visits to the UK and UK residents' visits abroad remain lower than pre-COVID-19 pandemic levels from 2019; however, spending was higher in 2023 than in 2019 for both groups

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- The value of UK domestic tourism peaked in 2019 at c£92B. Despite the recovery from a low point of £34B in 2020, the Domestic Tourism market in the UK faces challenges on two fronts including the cost-of-living crisis affecting consumer finance, and the strong bounce-back in overseas holidays post-pandemic.
- In terms of the UK public's intent to take overnight trips, both within the UK and abroad:
  - Overnight domestic trip intentions were on par with levels anticipated in April 2023
  - For overnight overseas trips, intentions are above 2023 levels
  - The barriers to taking a UK overnight trip in the next six months are the rising cost-of-living, UK weather, and personal finances.
  - The composition of the Wales trip intender appears different to 2023. In 2024, they are more likely to be families and from outside of Wales – the proportion of Wales residents planning an overnight trip in Wales has declined.
  - Consistent with 2023 and previous years, Wales overnight intenders have more limited financial means than intenders to other UK destinations – Wales attracting the second highest proportion of visitors 'hit hard' or 'being cautious and careful' as a result of the cost-of-living crisis
  - Wales trip intenders in 2024 are most likely to be motivated by a Wales trip 'to get away from it all and have a rest' and 'family time with my partner'. Notably, the motivation 'to connect with nature/be outdoors' amongst Wales trip intenders has increased since 2023 (an increase that has not occurred across the UK).
  - The most popular intended activities for Wales trip intenders are 'walking, hiking or rambling', 'trying local food and drink' and 'visiting heritage sites' – the latter two increasing since 2023 (and not increasing across the UK)
  - Wales trip intenders are most likely to anticipate their overnight trip being in a 'traditional seaside town' or a 'countryside or village' – both higher than in 2023. 'Rural coastline' and 'mountains or hills' are also popular; the latter is higher than across the UK. Intention to take a trip to a 'city or large town' is lower than in 2023, and much lower than across the UK
  - Consistent with previous reporting, Snowdonia is the most intended destination for an overnight trip in Wales
  - Consistent with 2023, Wales trip intenders are more likely to be planning a longer trip of 4+ nights than a short break. This is a difference to all UK trips, which are more balanced towards shorter breaks, driven by a higher interest in city breaks. Notably, UK trips are set to be shorter than in 2023 – a shift that

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has not occurred for trips to Wales. Wales relative resilience in trip length could be driven by perceptions as a good-value destination.

- 5.45 The Economic Impact Report acknowledges that the popularity of short break holidays can have negative impacts, especially in areas such as Eryri National Park and Gwynedd as areas with highest densities of short-term holiday let accommodation and second home ownership and the inability of local people to purchase homes in these popular holiday destinations. Whilst the proposed development of additional touring and camping pitches at Cae Du and Cae Canol wouldn't directly impact on the use of short-term holiday lets, it does provide an affordable offer for those who wish to visit Beddgelert and Eryri National Park.
- 5.46 The proposals also form part of a wider Visitor Recreation Masterplan and the provision of purpose built holiday accommodation such as those proposed at Forest Holidays, could contribute towards alleviating some of that pressure, by providing short-term holiday let accommodation in the village, which could in turn reduce the pressure on the local housing stock in Beddgelert.
- 5.47 The Economic Impact Assessment identifies trends that visitors are actively seeking locations that prioritise their health and relaxation. The proposed development aligns with those trends by providing accommodation in a natural setting, with relaxation facilities and access to activity experiences.
- 5.48 Outdoor and adventure tourism, which includes physical activity, cultural exchange, and activities in nature, has gained popularity. Outdoor activities such as walking and cycling are readily available in the local area.
- 5.49 Consumers are increasingly conscious of the environmental and social impacts of their choices. Sustainability has become a significant factor in decision-making, including travel choices. Travellers are actively seeking sustainable options and eco-friendly accommodation. Sustainable camping at a designated camping site with facilities to serve visitors supports sustainable camping in Eryri National Park and provides an alternative solution to wild camping in the National Park.
- 5.50 The proposed development at Cae Du and Cae Canol represents an investment of £0.3M in terms of construction cost and would support 3 additional full-time jobs and two part-time jobs. It is estimated that spend from additional visitors staying at Cae Du /Cae Canol and the proposed additional cabins at Forest Holidays could represent a potential additional income of £650,000 per annum.

## Social benefits

- 5.51 The Roberts Group are a small and local family run caravan and camping park business, with the majority of their sites predominantly based in Gwynedd with two sites within Eryri National Park. They have over 2,000 pitches over nine parks along with two small lodge Parks and two static caravan holiday Parks.
- 5.52 The Roberts Group employ around 30 full time staff and up to 40 part time staff in the season, all based in Gwynedd.
- 5.53 Mark Roberts, head of the Roberts Group, has grown up within the holiday park business and has raised a family of six Welsh speaking children in Pen Llyn. Three of his children are now an integral part of the Roberts Group business. The language and culture of North-west Wales is central to the Group and why they chose to live in Pen Llyn. Building a sustainable future for their family and loyal workforce in tourism in Gwynedd, in a way that contributes positively to the local communities and language, is a challenge that they look to fulfil every day.
- 5.54 The purchase of Cae Du and Cae Canol represents a major investment and ongoing commitment to increase the standards of the site. Since purchasing the site, the Roberts Group have already employed three full time staff members and have appointed two part-time staff. Their ambition is to work with the local community to improve what Cae Du can offer those living in Beddgerlert and those visiting.
- 5.55 Camping sites provide an opportunity for people of all different financial means to interact with each other and with nature in a meaningful way. Many people from urban areas look to camping (whether in tents or campers/motor homes) as their only chance to experience the rural British landscape.
- 5.56 The natural beauty of Eryri National Park is particularly attractive to tourists. Local destinations to the site include the base camp for Yr Wyddfa only 7km north of Beddgelert, the village of Beddgelert and numerous hiking, cycling and climbing destinations closer to the campsite.
- 5.57 The social and psychological benefits of spending time in such an environment should be considered as an important reason behind providing places for people to visit the area without great expense.

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- 5.58 The Visitor Recreation Masterplan for Beddgelert represents co-working between the Roberts Group and Forest Holidays to deliver overall improvements to the tourist accommodation in Beddgelert as well as ensuring support towards the local economy and local businesses.
- 5.59 The proposed development will contribute positively to the tourism function within this rural area of Eryri National Park, as well as the wider local area and other destinations which are popular with tourists. It is considered that the proposed scheme will offer economic benefits to the local area, which will contribute to the additional spend within the local economy.
- 5.60 The proposal will enhance affordable but sustainable and good quality holiday accommodation provided at an established rural business, which would contribute towards increased local spend by visitors within the local economy by supporting existing and future businesses in the area.

## Biodiversity

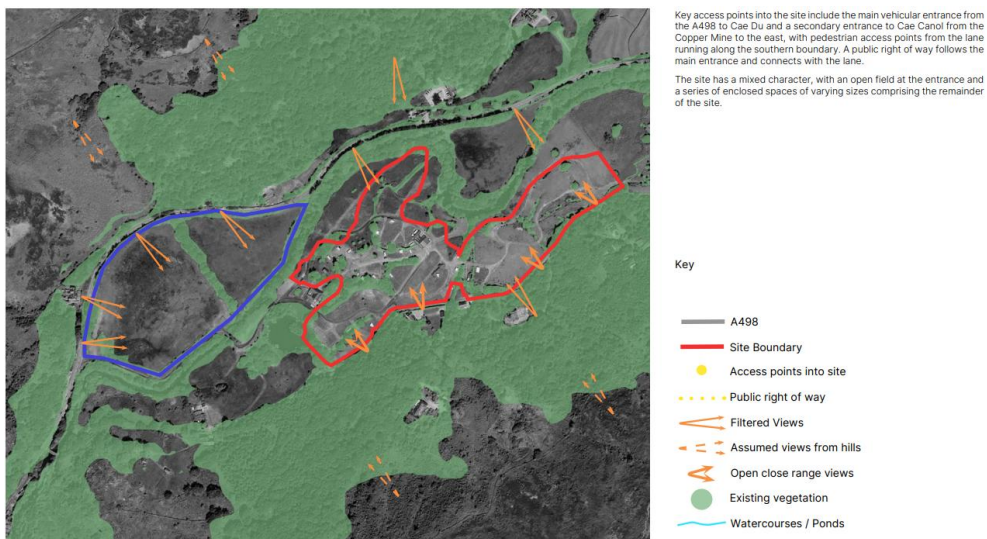
- 5.61 The application is accompanied by an Ecological Impact Assessment which identifies that the proposed development may impact on the following ecological receptors:
- Bats by way of roosting, foraging and commuting opportunity.
  - Breeding birds due to nesting opportunities throughout the site.
  - Otter by way of foraging and commuting habitat within the watercourse.
  - Reptiles and amphibians due to presence of common species cannot be discounted.
  - Notable plants such as floodplain meadow which is of good quality.
  - Invasive species such as giant rhubarb which are present on site.
  - Priority habitat (river) adjacent to the site and floodplain meadow on site.
- 5.62 The proposal also offers opportunities for net benefit for biodiversity including birds, bats, reptiles, amphibians and habitat through the provision of nesting boxes and bat boxes to be positioned on mature trees within the site, provision of reptile/amphibian refugia and enhancements to existing trees and hedges and the planting of new trees and hedgerows.
- 5.63 Further details regarding the potential impacts on biodiversity and the proposed biodiversity enhancement can be found in the Ecological Impact Assessment.

## Landscape and visual impact

5.64 Due to the sensitive nature of the site's location within the National Park and near a Area of Natural Beauty, and the need for the proposal to deliver significant environmental improvements, the application is accompanied by a Landscape Appraisal which assesses the potential landscape and visual impact of the proposed changes on the surrounding landscape character.

5.65 The Landscape Appraisal presents a site analysis, identifying opportunities and constraints which are summarised below:

**Figure 5.1 Extract of Site Analysis from Landscape Appraisal**



5.66 The proposals include landscaping enhancements which aim to:

- Enhance the biodiversity offer and green grid connectivity on the site;
- Adding amenity value and access to nature for visitors to the site; and
- Screening views from the wider area outside of the camping sites, while preserving key views of Eryri looking out of the site.

5.67 The Landscape Appraisal assesses several viewpoints to be considered. 17 viewpoints were originally chosen for assessment. Of these, 14 were included in the final assessment. Views were selected based on a selection of significant places such as surrounding PRoW, roads and monuments. 10 views were included in the final assessment. A summary of the assessment from these viewpoints is provided below:

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Viewpoint	Description of location	Visual impact	Comment
Viewpoint 1	Entrance to Cae Du	Negligible / none	Intervening landscape features limit views towards the site.
Viewpoint 7	Secondary entrance to Craflwyn Hall	Negligible / none	
Viewpoint 10	ProW above A498	Negligible / none	
Viewpoint 11	Lane south of site	Negligible / none	
Viewpoint 12	Lane south-east of site	Slight	Over time the impact of the proposals on this section of the footpath / road will be significantly reduced. The vegetation proposed for the boundary plantings is a mixture of evergreen and deciduous plantings that will assist in screening the campsite to some degree as soon as it is planted, and this screen will increase over time, with an estimated three years until it is fully grown.
Viewpoint 13	Lane south of site	Moderate	Over time the impact of the proposals on this section of the footpath / road will be significantly reduced. The vegetation proposed for the boundary plantings is a mixture of evergreen and deciduous plantings that will assist in screening the campsite to some degree as soon as it is planted, and this screen will increase over time, with an estimated three years until it is fully grown.
Viewpoint 14	Lane south-east of site	Moderate	Over time the impact of the proposals on this section of the footpath / road will be significantly reduced. The vegetation proposed for the boundary plantings is a mixture of evergreen and deciduous plantings that will assist in screening the campsite to some degree as soon as it is planted, and this screen will increase over time, with an estimated three years until it is fully grown.
Viewpoint 15	PRoW above Sygun Copper Mine	Major	Over time, the proposed planting strategy within Cae Du and Cae Canol will develop to create significant screening of the camping pitches and wider infrastructure. The vegetation proposed for the interior plantings is a mixture of trees and evergreen and deciduous shrub plantings that will assist in screening the campsite to some degree as soon as it is planted, and this screen will

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			increase over time, with an estimated three years until the shrubs are of an adequate size to screen, and 3-5 years until the trees have achieved the height and fullness needed to effectively screen the site from this view.
Viewpoint 16	Craflwyn Nature Reserve	Negligible	Cae Canol is only faintly visible from this viewpoint and will be fully screened during the summer months
Viewpoint 17	PRoW North-east of site	Slight	Intervening landscape features limit views towards the site.

- 5.68 The Landscape Appraisal concludes that the vast majority of the views from around the site are easily mitigated through new boundary plantings, which is the landscape proposal's offer.
- 5.69 Within the interior of the site there are plentiful new plantings of trees, shrubs, scrub and copses to diminish the open character, add biodiversity and soften the landscape impact of the campsites.
- 5.70 The landscape design of the campground at Cae Du includes new habitat and plantings to primarily focus on increasing the biodiversity offer on the site. Cae Canol is to include a more comprehensive approach to planting and screening that will not only increase biodiversity and climate resilience on the site but will protect views of the distant mountains whilst screening near and middle ground views of campsites. The strategy is to offer some privacy and intimate spaces for campers and still allow passersby to the north and south to enjoy views of the surrounding hills.
- 5.71 The Landscape Appraisal concludes that the proposals will not impact views or character of the area significantly, with the following points illustrating this in more detail:
- The site is not visible from the majority of the viewpoints assessed, and even the close views were filtered by intervening trees without leaf cover. It is likely that these views will be more negligible during warm summer months with vegetation in leaf
  - The proposed landscape strategy will create a layering in the landscape that will relate to the wider wooded character of the valley bottom whilst weaving cover and privacy from views throughout the site
  - Views of the site from high ground will be mitigated by the landscape strategy and new planting proposals, which will help to screen those views and which will only increase with time and maturity.



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- There will be a substantial increase in biodiversity and habitat creation as a result of the proposals, further strengthening the reasoning behind developing the site as proposed.
  - Camping sites such as Cae Du and Cae Canol offer affordable access to nature and the spectacular landscape of Eryri so that a broad spectrum of people can enjoy visiting and exploring the area
  - Cae Canol will be seen in the context of the existing campsite at Cae Du, and furthermore camping has already occurred on the Cae Canol site in the past, so it is not a change of use in terms of the visual use of the site.
  - The viewpoint photos show the site in the worst case scenario and out of season. The proposed site will only be occupied when the surrounding vegetation is in leaf which will significantly change the amount of visual screening and therefore the perceived visual impact of the development.
  - Proposed structures will be composed of materials in keeping with local character and will be placed upon least ecologically sensitive areas of the property, with plantings to surround and soften their visual effects.
- 5.72 The application site and views of the proposed development are not clearly visible from the majority of the viewpoints assessed, and even the close views are filtered by intervening trees without leaf cover. These views would be more negligible during summer months.
- 5.73 Views of the proposed development from higher ground (PRoW above Sygun Mine) is the only major impact identified and this view would be mitigated by the new proposed planting, which will help to screen those views. The effectiveness of the screening will only increase with time and maturity.
- 5.74 There would be a substantial enhancement in terms of biodiversity and habitat creation as well as access to nature, health and well-being benefits for people.
- 5.75 The additional pitches at Cae Canol will be seen in the context of the neighbouring Cae Du Campsite. However, there is currently lawful use for touring and camping use in Cae Canol.

## Green infrastructure

- 5.76 Planning Policy Wales (PPW) (Edition 12), 2024 advises that the quality of the built environment should be enhanced by integrating green infrastructure into development

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through appropriate site selection and use of creative design. It advises that with careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

- 5.77 PPW advises that a green infrastructure statement should be submitted with all planning applications and should be proportionate to the scale and nature of the development and will describe how green infrastructure has been incorporated into the proposal.
- 5.78 The application is accompanied by a Green Infrastructure Statement which identifies that on the site, wet meadow and acid grassland features (priority habitat) and trees are retained (including trees identified with low bat roost potential). Provision of new overseeded meadow and scrub/woodland planting along external boundary and some internal boundaries will strengthen the existing local habitat provision.
- 5.79 On a local level, proposed habitat provides commuting and stepping stone habitat across the site through provision of wet meadow, enhanced and protected acid grassland, hedgerow, tree and shrub planting. It is considered that the site's functionality to provide foraging and commuting habitat for local fauna will be enhanced as a result of the proposals. Additional nesting and roosting habitat is provided through provision of bat and bird boxes. Refugia for small mammals, amphibians and invertebrates is provided via the provision of log piles as part of the proposals.
- 5.80 On a more landscape scale, the proposed planting will strengthen existing connectivity to nearby wildlife sites situated to the north and south and add to the retained habitats identified as NRW acid grassland and fen Local Ecological Network.
- 5.81 Generally speaking, new areas of planting features provide habitats for wildlife and ecosystem services such as water and air quality and control and carbon sequestration, helping to contribute to climate mitigation and adaptation. Hedgerow and tree planting can also function as barriers to air pollution and protect soils from erosion.
- 5.82 The provision of mitigation will result in clear net benefits for biodiversity, compliant with local policy and the Step-Wise Approach as detailed within PPW.

## Welsh language and culture

- 5.83 Development Policy 18: 'The Welsh language and the Social and Cultural fabric of communities' of the Eryri LDP seeks to take account of the needs and interests of the Welsh language when determining planning applications. The policy advises that tourism developments creating 10 or more holiday units should be accompanied by a Community and Linguistic Statement.
- 5.84 The application is accompanied by a Community and Linguistic Statement.
- 5.85 Cae Du and Cae Canol Campsites have been purchased in 2024 and now form part of the Roberts Group's portfolio of caravan, camping and lodge sites across Gwynedd and Eryri. As a small, family run business, based in Pwllheli, Pen Llŷn, the Welsh language is intertwined in the operation of the existing business and the Welsh language is a living language, used on daily basis by the team. Mark Roberts, Head of the Roberts Group, is a fluent Welsh speaker who has raised six Welsh speaking children, three of whom are involved in the family business. The applicant therefore understands and respects the importance of the Welsh language as an unique part of the culture of Wales and Eryri National Park.
- 5.86 The proposals represent significant investment by the applicant to improve the overall standards of Cae Du Campsite, through environmental, biodiversity, landscaping and visual impact, flood risk and facilities improvements. These would ensure that Cae Du Campsite is an attractive campsite in the National Park, seeking to address current issues related to 'wild camping' through the provision of a site providing sustainable tourism options for visitors with high-quality facilities.
- 5.87 The closure of Cae Du Campsite for three consecutive seasons between 2020 and 2023 had a detrimental impact on local businesses in Beddgelert. The nature of touring and camping accommodation means that visitors are more likely to visit local eating establishments, and the closure of Cae Du was felt locally amongst local businesses.
- 5.88 Re-opening the campsite in 2024 provided support for local business through spin-off spending. The proposals offer the opportunity to further support the local economy and local businesses in Beddgelert through spin-off spending.
- 5.89 The proposals would also offer employment opportunities for local people, where the Welsh language is a valuable skills, especially in public facing roles.

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- 5.90 The proposal presents the opportunity to have a beneficial effect on Welsh language and culture through measures to increase the visibility of the Welsh language, opportunities to use the Welsh language, provision of employment opportunities and supporting the local economy and the local supply chain during construction and operation.
- 5.91 The development therefore has the potential to beneficially impact the Welsh language through raising awareness of the Welsh language and culture amongst visitors and providing enhanced opportunities for Welsh speaking employees at Cae Du and Cae Canol to use their Welsh language skills in the workplace, where they are respected and valued.

## Drainage and flood risk

- 5.92 All surface water drainage for the development is designed to incorporate SuDS principles including roof drainage from new buildings discharging directly to the ground via infiltration strips and road drainage is managed through porous surfaces or edge infiltration.
- 5.93 In terms of foul water drainage, new connections would be provided from the proposed two new toilet blocks which would connect to the public sewer via an existing connection from the Cae Du site.
- 5.94 As set out earlier in this Statement, parts of the application site (Cae Du) lie within a C2 flood risk area whilst the remainder of Cae Du lies in a Zone B area (areas known to have flooded in the past). Parts of the application site which form Cae Canol are in a C2 flood risk area.
- 5.95 When turning to the updated Flood Maps for Planning, the extent of the C2 flood risk area broadly reflects that of Flood Zone 3 and other parts of the site are identified as Flood Zone 2.
- 5.96 It should be noted that planning permission already existing in Cae Du with the area used for camping and touring caravan purposes outlined in Figure 2.6 with a heavy black line. Cae Canol benefits from a certificate of lawful use for touring caravan and camping use in the area identified in Figure 2.7.
- 5.97 Whilst preparing the planning application, careful consideration has been given to the extent of flood risk within both Cae Du and Cae Canol, and the information from the

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Flood Maps for Planning (which includes climate change information to show how this will affect flood risk extents for rivers, the sea and surface water and small watercourses over the next century) has been used to define the area which remains flood free during the 1% AEP (100-year) fluvial event and which is therefore considered suitable for development. This area has been used to guide the reconfiguration of the layout of Cae Du and the proposed layout for Cae Canol, in order to provide an overall betterment for the site by moving camping and touring pitches away from the riparian edge and areas at risk of flooding. This is considered to be a significant benefit that could be delivered as part of the proposal.

- 5.98 The application is accompanied by a Simplified Flood Consequence Assessment (FCA), which considers the risks associated with the 0.1% AEP (1,000-year) fluvial event and with surface water and small watercourses and proposes appropriate mitigation measures.
- 5.99 The area available for the proposed development has been limited by the Flood Zone 3 outline, with all the pitches set outside this area. This will ensure that the proposed development remains flood free for the 1% AEP (100-year) fluvial + Climate Change event.
- 5.100 The Simplified FCA assesses two potential risks:

### Flood Risk Associated with the 0.1% (1,000-year) Fluvial + Climate Change Event

- 5.101 Part of the proposed development is shown to be within Flood Zone 2 which relates to the 0.1% AEP (1,000-year) fluvial + climate change event. Under this scenario the Afon Glaslyn could break its banks at the bend at the upstream extent of the site resulting in shallow depths of water flowing across some of the new pitches. NRW describes the likelihood of this occurrence as “very low risk” by which it means that each year, this area has a chance of flooding of less than 1 in 1000 (0.1%).

### Flood Risk Associated with Surface Water and Small Watercourses

- 5.102 The area at risk of flooding from surface water and small watercourses. NRW describes the likelihood of this occurrence as “medium risk” by which it means that each year, this area has a chance of flooding between 1 in 100 (1%) and 1 in 30 (3.3%).

### Mitigation measures

5.103 Whilst the proposed development has been set outside the Flood Zone 3 outline there is still as “very low risk” of fluvial flooding, during a 0.1% AEP (1,000-year) + Climate Change event, and a “medium risk” of flooding from surface water and small watercourses. The following mitigation measures are therefore suggested and have been agreed by the applicant:

- The site owners should compile a Caravan Park Flood Plan (approved by NRW) which details the actions required in the event of an emergency. This Plan should be updated annually.
- The pitches within the flood risk area for surface water and small watercourses should be restricted for caravan use only (i.e. no tents).

5.104 The proposal would reconfigure the layout of the site so as to relocate existing touring and camping pitches away from areas of flood risk and the riparian edge, to areas where the risk of flooding can be properly managed.

## 6. Other design considerations

### Materials

- 6.1 Two new buildings are proposed as part of the development comprising of two new toilet blocks. These would be designed to reflect the appearance of a traditional stone built building with a traditional slate roof, reflective of traditional buildings of agricultural nature in the rural setting of the National Park.
- 6.2 Hard landscaping would be kept to a minimum and would comprise of:
- New internal access roads;
  - Selection of pitches to have a hardcore finish; and
  - Waste/recycling facilities.

### Environmental sustainability

- 6.3 The application site is located in a rural area which also has public transport services from the village of Beddgelert, providing access to popular tourism locations in the locality. More details are provided in section 7 of this Statement.

### Community safety

- 6.4 The application proposes additional touring and camping pitches as part of the existing Cae Du Campsite, which would extend into Cae Canol, which has also been used for camping and touring use. The site has clear boundaries at present, however, as part of the proposals, additional landscape planting is proposed along the site's southern boundary which would enhance the safety and privacy of the site from the public right of way and highway directly adjoining the site to the south. The development is not considered to alter the community safety aspects of the site.

## 7. Accessibility

### Planning policy

- 7.1 The relevant national policies and guidance relating to accessibility are set out within:
- Planning Policy Wales, Edition 12, (2024); and
  - Technical Advice Note 18 'Transport' (2007).
- 7.2 The relevant planning policy within the adopted LDP is:
- Strategic policy: Accessibility and Transport.

### Movement to, from and within the development

- 7.3 Vehicular access to Cae Du Campsite is provided via an existing entrance from the A489 which provides good visibility in both directions. No alterations are proposed to the existing access.
- 7.4 An existing internal access road provides access to the various areas within Cae Du, with access also being provided internally through to Cae Canol. New internal access roads are limited to areas in Cae Canol, in order to provide access to new camping and touring pitches.

### Sustainability

- 7.5 The site benefits from being located on the edge of the popular tourist village of Beddgelert, which is accessible from Caernarfon to the north-west, Capel Curig/Betws y Coed to the north-east and Porthmadog to the south.
- 7.6 There is a comprehensive network of Public Rights of Ways (PRoWs), permissive paths and picturesque road networks which are popular and suitable for both cyclists and pedestrians nearby. The lane that runs along the site's southern boundary is a single lane highway, but is also used by walkers and cyclists providing a connection between Beddgelert and Nant Gwynant. There is a public footpath network in the woodland area to the south of the site. Cae Du and Cae Canol campsites are considered to be in a sustainable and accessible location, providing easy walking and cycling access to the village of Beddgelert.



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- 7.7 The closest bus stop to the site is around 400m to the south at Tai Sygun on the approach into Beddgelert and is served by the S4 bus. This service runs from Pen y Pass to Porthmadog via Beddgelert and provides a two-hourly service from this stop.
- 7.8 The village of Beddgelert has access to public transport and is served by S4 as well as S3. This service runs every 2 hours (weekdays) and provides access from Beddgelert Pen y Pass to Porthmadog via Beddgelert and Beddgelert to Caernarfon.
- 7.9 Whilst there isn't a public railway station, Beddgelert does benefit from access to the restored heritage railway; Welsh Highland Railway, which is a 25-mile long restored narrow-gauge heritage railway operating between Caernarfon and Porthmadog, passing through numerous popular tourist destinations. Trains operate within the summer months and additional trains may run according to demand. There is a Welsh Highland Railway pick-up within the village.

## Parking

- 7.10 The site plan identifies that pitches comprise of a mix of grassed pitches and multi-user hardstanding pitches. The typical layout of the pitches is identified on the site masterplan demonstrating that each hardstanding pitch has a designated area for one car to park with each pitch. Grassed pitches have been spaced so as to enable sufficient space for one car to park with each pitch.

## 8. Conclusion

- 8.1 This proposals seek to deliver overall improvements to Cae Du and Cae Canol Campsites through:
- reconfiguration of the layout at Cae Du to relocate camping pitches away from area of flood risk and relinquishing the lawful use certificate for camping and touring at Cae Canol, ensuring that camping and touring pitches would be moved away from areas of flood risk. This would deliver significant improvements to safety on users.
  - Extensive comprehensive landscaping and biodiversity enhancement scheme to deliver reduction in landscape and visual impact from nearby viewpoints, and deliver net benefits in terms of biodiversity, habitat creation and management of existing habitats.
  - Incorporating a riverside walk providing recreational access for visitors and users of Cae Du and Cae Canol with an informal picnic area and incorporating ecological interpretation.
  - Enhance facilities on site through investment in two new traditionally designed toilet blocks.
- 8.2 The overall improvements to be delivered at Cae Du Campsite require significant investment which would be delivered by increasing the overall number of pitches at Cae Du Campsite by extending into Cae Canol.
- 8.3 The proposals would form part of a Visitor Recreation Masterplan involving Forest Holidays as well as Cae Du and Cae Canol sites, which would support the local tourism economy of the village of Beddgelert in a way that aligns with the thrust of the Gwynedd & Eryri 2035 Sustainable Visitor Economy Plan.
- 8.4 The Visitor Recreation Masterplan provides a schematic overview of the proposal including opportunities to improve pedestrian and cycling access into the village as well as providing significant benefits in terms of landscaping and biodiversity enhancement to green infrastructure networks.
- 8.5 Both Roberts Group and Forest Holidays have been collaboratively working together to deliver schemes at both Cae Du Campsite and Forest Holidays that would deliver economic benefits for the tourism and visitor economy of Beddgelert.
- 8.6 Expanding the provision of cabins at Forest Holidays would continue to support the local economy leading to spin-off spending within businesses in Beddgelert. The spin-

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off spending from visitors staying in touring caravans and camping pitches differs from those staying in cabins. Increasing the touring and camping pitches Cae Du and Cae Canol would retain the economic benefits from touring and camping pitches for the benefit of the village and its businesses through retention of economic spin-off spending benefits from visitors of the touring and camping pitches, whilst replacing the touring and camping pitches with additional cabins at Forest Holidays.

- 8.7 The proposed development at Cae Du and Cae Canol Campsites can be supported under Strategic Policy I: Tourism and Development and Policy 21: Tourism and Recreation, which support sustainable development proposals which do not adversely impact on the “special qualities” of the National Park.
- 8.8 As demonstrated throughout this report, we consider the proposal to be in accordance with the adopted policies within the Eryri LDP, as well as the overarching principles of the PPW.

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