ECOLOGICAL ASSESSMENT

At:

Forest Holidays, Beddgelert

Consultant Report on behalf of Forest Holidays

Ecoscope ltd.

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REPORT STATUS AND QUALITY CONTROL

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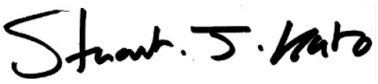
Signature		

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EXECUTIVE SUMMARY

Ecoscope Ltd was commissioned to undertake an Update Ecological Assessment to assess the potential impact of proposals on ecological features at Forest Holidays, Beddgelert, Gwynedd, Caernarfon, LL55 4UU. The proposals are for the provision the development of new tourist accommodation including holiday lodges and touring caravan pitches with associated infrastructure.

The below table summarises the ecological receptors at the Site, the potential impact in relation to the proposals, and recommendations, where necessary, to avoid, mitigate, and/or compensation, in accordance with the relevant legislation and guidance.

Table 1 – Summary of likely impacts from proposals and recommendations

Receptor	Status	Potential Impact	Recommendation
Bats	• Roosting, foraging and commuting opportunity.	• Commuting and foraging habitat loss • Unnecessary illumination	• Any lighting to be sensitively designed (BCT GN08/23). • Construction during daylight hours. • 'Low' graded trees to be soft-felled where removal is req.
Breeding birds	• Nesting opportunity throughout the Site.	• Active nests/young may be impacted by construction.	• Avoid nesting season or SQE to survey site prior to construction.
Otter	• Foraging and commuting habitat within watercourse to east.	• Risk of animals being trapped in excavation.	• Provide means of escape for any excavations.
Reptiles & Amphibians	• Presence for common species cannot be discounted.	• Injury or jilling during construction within damper areas.	• Works to follow RAMs.
Notable plants	• Bluebells present on Site (local priority species)	• Loss of plant from the Site.	• Retain bluebell populations, where possible. • Micro-site cabins to avoid bluebells (if to be impacted)
Invasive species	• Rhododendron and variegated yellow archangel present at Site.	• Spread of invasive species offsite.	• Method Statement/ CEMP: Biodiversity

Receptor	Status	Potential Impact	Recommendation
Priority Habitat	• Priority habitat adjacent to Site (river).	• Construction may cause pollution event.	• Method Statement/ CEMP: Biodiversity
Net Benefit for biodiversity	• Birds	• Nesting box provision	
	• Bats	• Provision of bat boxes	
	• Reptiles & amphibians	• Reptile/amphibian refugia	
	• Habitat	• Enhancements to existing/retained woodland.	

1. INTRODUCTION

1.1 BACKGROUND

1.1.1 Ecoscope Ltd was commissioned by Forest Holidays ('the Applicant'), to undertake an Ecological Assessment in relation to proposals at Forest Holidays, Beddgelert, Gwynedd, Caernarfon, LL55 4UU ('the Site') (central grid reference: SH57834895). The Site is situated within a rural environment northwest of the town of Beddgelert, Eryri The Site location is shown in Figure 1.

1.1.2 Historic ecological survey and assessment has been undertaken with regards to the Site, as below. Relevant details are summarised within this report. For full details, please refer to the original reports:

- Beddgelert Ecology Planning Report, AECOM (May, 2017)
- Beddgelert Breeding Bird Survey Report, AECOM (July, 2016)
- Beddgelert Biodiversity Enhancement and Management Plan, AECOM (June, 2017)

1.2 PROPOSALS

1.2.1 Forest Holidays and Roberts Group have collaborated to develop a Visitor Recreation Masterplan involving both Forest Holidays and Cae Du and Cae Canol sites. At present, Forest Holidays benefits from planning permission for 16 cabins and a mix of 85 touring and camping pitches. The new proposal would see the provision of an additional 22 cabins at Forest Holiday, providing a total of 38 cabins on site. In addition, a Natural Play area and new reception building are proposed (refer to Figure 2).

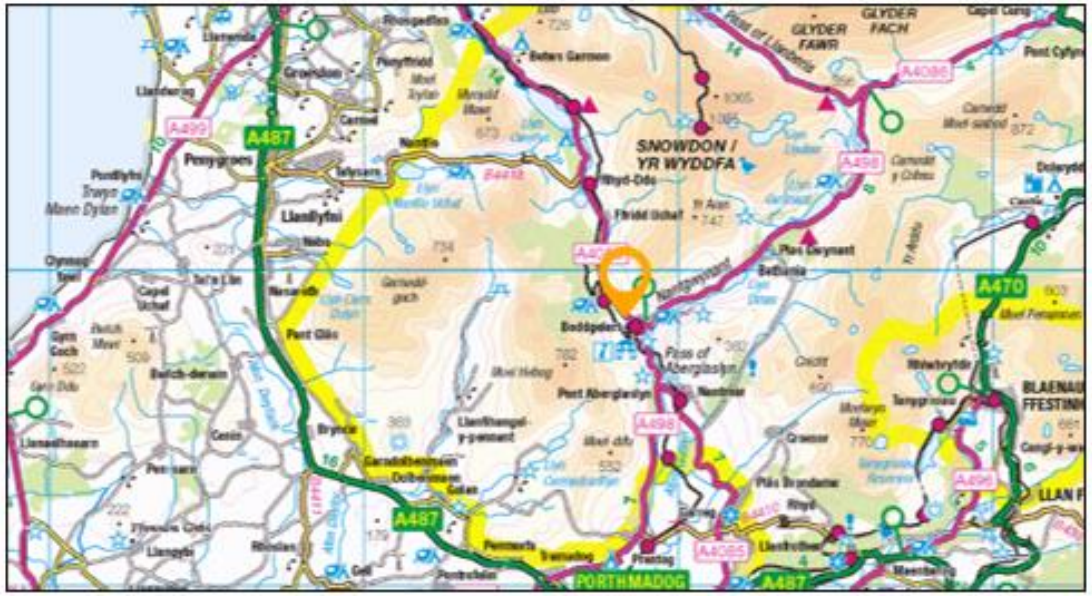
1.3 REGULATORY FRAMEWORK

1.3.1 This report has been prepared taking relevant statutory instruments into account; including domestic legislation such as Acts of Parliament, and Regulations to comply with European Directives. This is described in full in Appendix 6.1, and in summary as follows:

Legislation & Policy

- Environment (Wales) Act 2016

- The Conservation of Habitats and Species Regulations 2017 (as amended)
- Wildlife and Countryside Act 1981 (as amended)
- Protection of Badgers Act 1992
- Countryside and Rights of Way (CRoW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Planning Policy Wales (Edition 12, February 2024))
- Local Policy (refer to 3.4)



Legend

Site location

Site boundary (approx.)

N

Client: Forest Holidays

Project title	Project ID
Forest Holiday	ECO_1112-01

Subject: Ecological Assessment

Drawing number: ECO1112-01-01EcoA_A

Drawing date: 07/06/24

Drawn by: MM

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Figure 1: ***Site Location***

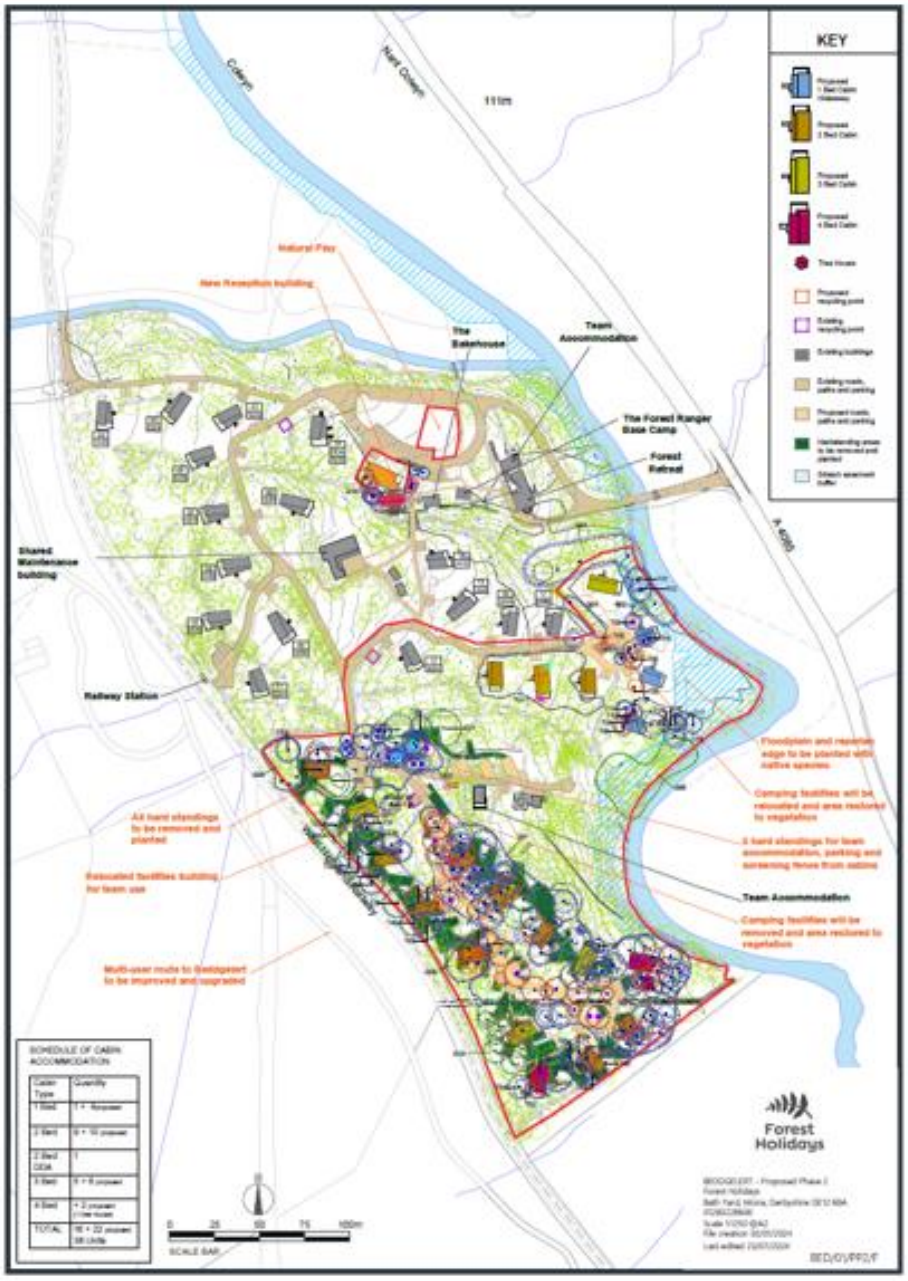

Figure 2: ***Proposals***

Legend

Refer to drawing ref: BED/01/PP2/F

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Client Forest Holidays

Project title	Project ID
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Subject

Ecological Assessment

Drawing number

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2. METHODOLOGY

2.1 DESK STUDY

2.1.1 The desk study involved collecting records from Cofnod and included a 2km Area of Search (Aos) from the Site. Records included:

- Protected and notable species
- Designated sites
- Non-designated sites
- Ancient woodland
- Priority Ecological Networks
- Section 7 Habitats of Principal Importance

2.2 FIELD SURVEY

Phase I Habitat Survey

2.2.1 A Site visit was carried out on the 22nd May 2024 where a Phase I habitat survey was undertaken. The survey was carried out by Mark Morgan BSc MCIEEM and Principal Ecologist. The Phase I survey involved identifying and mapping the dominant habitat types following the Phase I habitat survey methodology in accordance with JNCC 2010[1]. Dominant plant species were noted (including aliens), as were any uncommon species or species indicative of habitat types, but not all species would have been visible and there was no attempt to compile exhaustive species lists. The survey included at least 30m from the boundary to ensure badgers will not be affected.

2.2.2 Dominant plant species were noted (including aliens), as were any uncommon species or species indicative of habitat types, but not all species would have been visible and there was no attempt to compile exhaustive species lists. The survey included at least 30m from the boundary where possible to ensure badgers will not be affected.

[1] **Joint Nature Conservation Committee 2010** Handbook for Phase I habitat survey: a technique for environmental audit. JNCC, Peterborough.

2.2.3 During this field survey, attention was paid to habitats and features that may provide opportunities for protected species to be present at other times of year and thus inform the recommendations for further survey where appropriate.

Ecological Assessment

2.2.4 This Assessment follows guidance from CIEEM (2018[2]) and complies with recommendations in BS42020[3] and BS8683[4].

Table 2 – Personnel

Name	Contribution	Qualifications
Mark Morgan	Phase I survey Mapping Reporting	Principal Ecologist. BSc. (Hons) (First-Class degree in Plant Biology), MCIEEM

2.3 CONSTRAINTS

2.3.1 There were no constraints to the survey or assessment.

[2] **Chartered Institute for Ecology and Environmental Managers (2018)** Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine v1.2 (April 2022). Chartered Institute of Ecology and Environmental Management, Winchester.

[3] **The British Standards Institution 2013** BS 42020:2013 Biodiversity - Code of practice for planning and development. Published by BSI Standards Limited 2013. ISBN 978 0 580 77917 6

[4] **The British Standards Institution 2021** BS 8683 Process for designing and implementing Biodiversity Net Gain – specification. Published by BSI Standards Limited 2021. ISBN 978 0 539 01986 5

3. DESK STUDY RESULTS

3.1 SITES

Designated Sites

3.1.1 Details of Designated Sites within 2km of the proposals, including their reasons for designation, are provided in Table 3, below and shown in Figure 3.

Non-designated Sites

3.1.2 There a no Local Wildlife Sites within 2km, however, there are two Important Plant Areas:

- Meirionnydd Oakwoods IPA (c.915m to the south)
- Snowdon IPA (c.750m to the southwest)

National Parks

3.1.3 The Site sites wholly within Eryri National Park.

Table 3 – Statutory designated Sites within 2km of the proposals

Designated site name	Distance to site (m)	Reasons for designation
Meirionnydd Oakwoods and Bat Sites SAC	925	• Old sessile oak woods with ilex and Blechnum in the British isles • Alluvial forest with Alnus glutinosa and Fraxinus excelsior • Lesser horseshoe bat
Coedydd Beddgelert a Cheunant Aberglaslyn SSSI	925	• Sessile oak woodlands (temperate forest) • Mosses and liverworts • Lesser horseshoe bats • Soldier beetle
Moel Hebog SSSI	750	• Base-rich outcrops • Species-rich grassland • Flush • Grag flora
Afon Gwyrfai a Llyn Cwellyn SSSI	1900	• Aquatic plant assemblage • Arctic charr • Atlantic salmon • Otter
Meirionnydd Oakwoods IPA	750	• Important plant assemblage
Snowdon IPA	925	• Important plant assemblage

Designated site name	Distance to site (m)	Reasons for designation
Abbreviations:	SPA	Special Protection Area
	SAC	Special Area of Conservation
	SSSI	Site of Special Scientific Interest
	IPA	Important Plant Area

3.2 HABITATS

3.2.1 The following Priority Habitats are recorded within 2km of the Site:

- Ancient semi-natural woodland (the nearest c.174m to the north)
- Lowland dry acid grassland
- Purple moor grass and rush pasture
- Upland flushes, fens and swamps
- Upland heathland
- Lowland heathland
- Raised bog
- Blanket bog
- Coastal floodplain and grazing marsh
- Inland rock outcrop and scree habitats
- Lowland fens and reedbeds

3.2.2 None of these habitats are considered likely to be impacted by the proposals.

3.3 SPECIES RECORDS

3.3.1 A summary of protected and notable species records within 2km of the Site from Cofnod, is provided in Table 4.Records dating older than 10 years have been discarded. A total of 433 individual species records were returned. Only those of relevance to the study have been included. Full records lists can be provided upon request.

Table 4 - Protected and notable species records within 1km

Common name	Latin name	Status	Relevance to study
Mammals			
Badger	*Meles meles*	PoBA	Potential habitat on Site.
Polecat	*Mustela putorius*	LBAP S7	Potential habitat on Site.
Otter	*Lutra lutra*	CoHS WCA Sch 5 LBAP S7	Potential habitat immediately adjacent to Site.
Noctule	*Nyctalus noctule*	CoHS WCA Sch 5 LBAP S7	Potential habitat on Site.
Common pipistrelle	*Pipistrelus pipistrellus*	CoHS WCA Sch 5 LBAP S7	Potential habitat on Site.
Soprano pipistrelle	*Pipistrellus pygmaeus*	CoHS WCA Sch 5 LBA S7	Potential habitat on Site.
Brown-long eared	*Plecotus auritus*	CoHS WCA Sch 5 LBAP S7	Potential habitat on Site.
Lesser horseshoe	*Rhinolophus hipposideros*	CoHS WCA Sch 5 LBAP S7	Potential habitat on Site.
Birds			

Common name	Latin name	Status	Relevance to study
Lesser redpoll	*Acanthis cabaret*	UKBAP S7	Potential habitat on Site.
Skylark	*Alauda arvensis*	RBoCC UKBAP S7	Site is not suitable.
Kingfisher	*Alcedo atthis*	WCA Sch1	Potential habitat immediately adjacent to Site, although lack of breeding habitat present.
Tree pipit	*Anthus trivialis*	RBoCC	Potential habitat on Site.
Cetti's warbler	*Cettia cetti*	WCA Sch1	Site is not suitable.
Black-headed gull	*Chroicocephalus ridibundus*	ABoCC	Site is not suitable.
Cuckoo	*Cuculus canorus*	S7 RBoCC	Potential habitat on Site.
Yellowhammer	*Emberiza citrinella*	S7 RBoCC	Potential habitat on Site.
Reed bunting	*Emberiza schoeniclus*	S7 RBoCC	Site is not suitable.
Merlin	*Falco columbarius*	WCA Sch1 RBoCC	Site is not suitable.
Kestrel	*Falco tinnunculus*	S7 ABoCC	Site is not suitable.
Pied flycatcher	*Ficedula hypoleuca*	S7 LBAP ABoCC	Potential habitat on Site.
Brambling	*Fringilla montifringilla*	WCA Sch1	Potential habitat on Site.
Herring gull	*Larus argentatus*	S7 RBoCC	Site is not suitable.
Linnet	*Linaria cannabina*	LBAP RBoCC S7	Potential habitat on Site.
Grasshopper warbler	*Locustella naevia*	LBAP	Site is not suitable.

Common name	Latin name	Status	Relevance to study
		RBoCC S7	
Crossbill	*Loxia curvirostra*	WCA Sch1	Site is not suitable.
Red kite	*Milvus milvus*	WCA Sch1 LBAP	Site is not suitable.
Yellow wagtail	*Motacilla flava*	S7 RBoCC	Potential habitat on Site.
Spotted flycatcher	*Muscicapa striata*	LBAP S7 RBoCC	Potential habitat on Site.
House sparrow	*Passer domesticus*	LBAP S7 RBoCC	Potential habitat on Site.
Wood warbler	*Phylloscopus sibilatrix*	LBAP S7 RBoCC	Potential habitat on Site.
Golden plover	*Pluvialis apricaria*	LBAP S7	Site is not suitable.
Dunnock	*Prunella modularis*	S7 ABoCC	Potential habitat on Site.
Chough	*Pyrrhocorax pyrrhocorax*	WCA Sch1 LBAP S7	Site is not suitable.
Bullfinch	*Pyrrhula pyrrhula*	LBAP S7 ABoCC	Potential habitat on Site.
Firecrest	*Regulus ignicapilla*	WCA Sch1 LBAP UK BAP	Potential habitat on Site.
Starling	*Sturnus vulgaris*	S7 UK BAP	Potential habitat on Site.

Common name	Latin name	Status	Relevance to study
		LBAP RBoCC	
Redwing	*Turdus iliacus*	WCA Sch1 ABoCC	Potential habitat on Site.
Song thrush	*Turdus philomelos*	S7 UK BAP LBAP ABoCC	Potential habitat on Site.
Fieldfare	*Turdus pilaris*	WCA Sch 1 RBoCC	Potential habitat on Site.
Little egret	*Egretta garzetta*	LBAP	Potential habitat immediately adjacent to Site.
Stonechat	*Saxicola rubicola*	LBAP	Site is not suitable.
Reptiles			
Common lizard	*Zootoca vivipara*	WCA Sch 5 (partial protection) LBAP S7	Limited suitability at the Site.
Amphibians			
Common frog	*Rana temporaria*	WCA Sch 5 (partial protection)	Suitable habitat on Site.
Invertebrates			
Dark green fritillary	*Speyeria aglaja*	LBAP	Limited potential on Site.
Plants			
A willowherb	*Epilobium montanum x obscurum = E. x aggregatum*	LBAP	Limited potential on Site.
Broad-leaved helleborine	*Epipactis helleborine*	LBAP	Potential habitat on Site.

Common name	Latin name	Status	Relevance to study
Vervain	*Verbena officinalis*	LBAP	Site is not suitable.
Invasive species			
Grey squirrel	*Sciurus carolinensis*	Sch 9, P I	Potential habitat on Site. Species also present within boundaries.
American mink	*Neovison vison*	WCA Sch 9, P I	Suitable habitat adjacent to the Site.
Feral goat	*Capra hircus*	WCA Sch 9, P I	Site is not suitable.
Montbretia	*Crocosmia pottsii x aurea = C. x crocosmiiflora*	WCA Sch 9, P II	Potential habitat on Site.
New Zealand willowherb	Epilobium brunnescens	WCA Sch 9, P II	Potential habitat on Site.
Japanese knotweed	*Fallopia japonica*	WCA Sch 9, P II	Potential habitat on Site.
Himalayan balsam	*Impatiens glandulifera*	WCA Sch 9, P II	Potential habitat on Site.
Variegated yellow archangel	*Lamiastrum galeobdolon subsp. argentatum*	WCA Sch 9, P II	Potential habitat on Site.
Rhododendron	*Rhododendron ponticum*	WCA Sch 9, P II	Potential habitat on Site. Species also present within boundaries.
Barnacle goose	*Branta leucopsis*	WCA Sch 9, P I	Site is not suitable.
Canada goose	*Branta canadensis*	WCA Sch 9, P I	Site is not suitable.
Abbreviations:	WCA Sch 1	Schedule 1 of the Wildlife and Countryside Act, 1981	
	WCA Sch5	Schedule 5 of the Wildlife and Countryside Act, 1981	
	WCA Sch6	Schedule 6 of the Wildlife and Countryside Act, 1981	
	WCA Sch9, P I & P II	Schedule 9 of the Wildlife and Countryside Act, 1981 – Part I (P1) & Part II (PII)	
	CoHS	Conservation of Habitat and Species Regulations, 2017	
	PoBA	Protection of Badgers Act, 1992	
	ABoCC	Birds of Conservation Concern, Amber	
	RBoCC	Birds of Conservation Concern, Red	

Common name	Latin name	Status	Relevance to study
	LBAP	Local Biodiversity Priority Species	
	UK BAP	UK Priority Species	
	S7	Environment (Wales) Act 2016 (Section 7)	

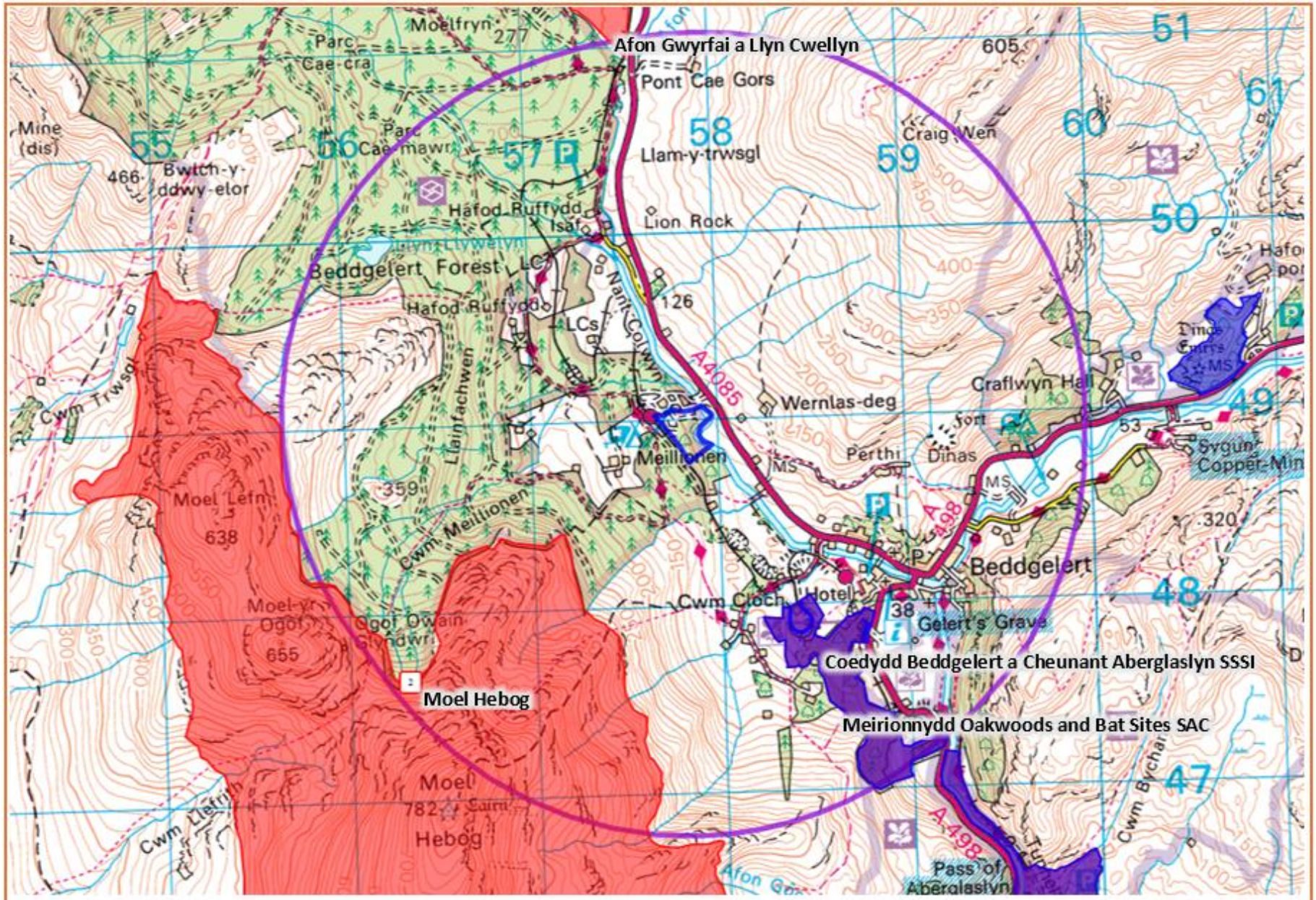

Figure 3: ***Designated Sites***

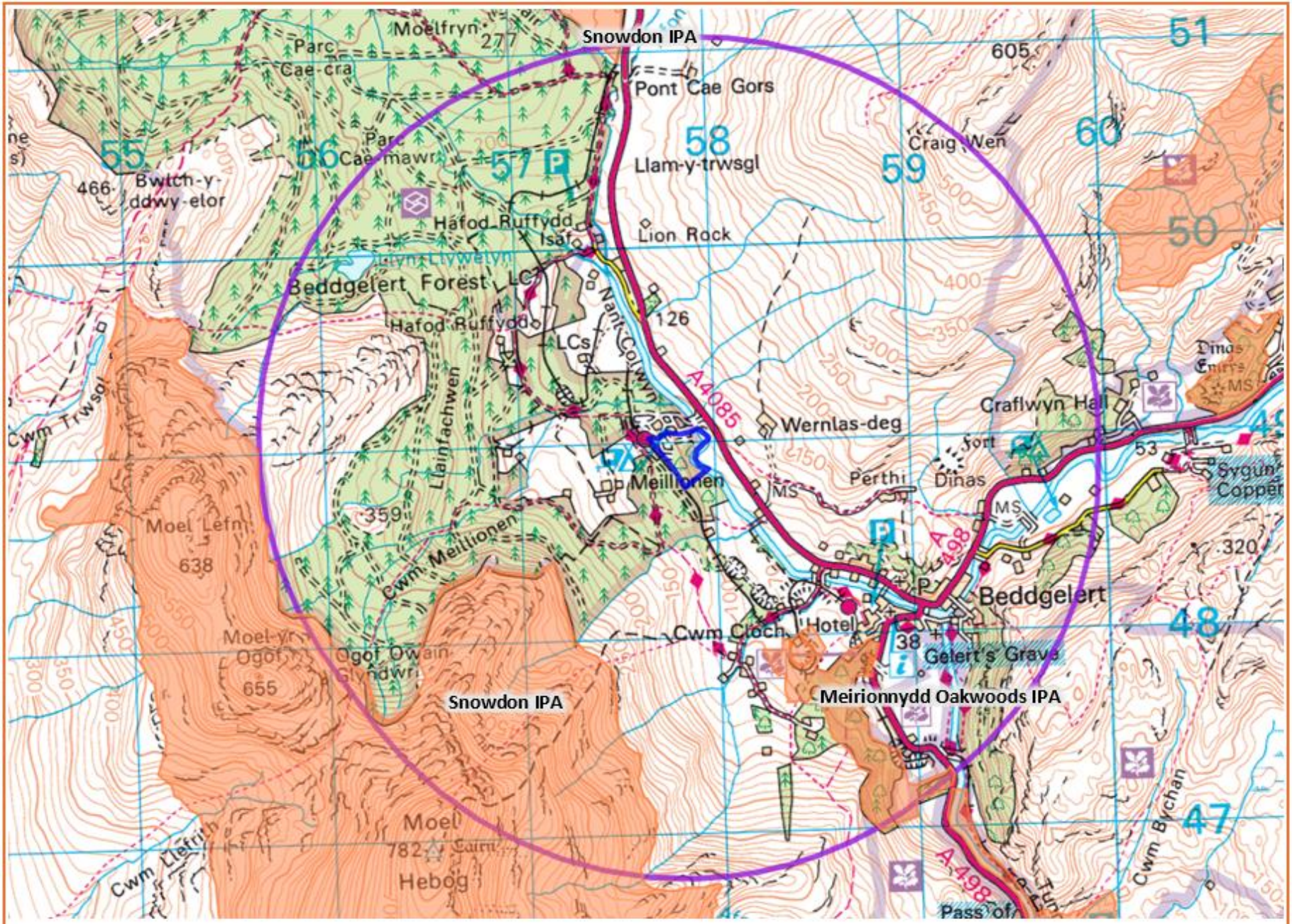

Figure 4: ***Important Plant Areas within 2km***

3.4 LOCAL POLICY

3.4.1 The local planning authority is Cyngor Gwynedd Council. Their local plan is the Anglesey and Gwynedd Joint Local Development Plan (AGJLDP) (currently adopted) however, a new plan is currently being drafted; Gwynedd Local Development Plan (the new Plan), which covers the period 2024 – 2039. The adopted AGJLDP contains the relevant policies to biodiversity:

- Policy PS 19 – Conserving and where appropriate enhancing the natural environment
- Policy AMG 5 – Local biodiversity conservation
- Policy AMG 6 – Protecting sites of regional or local significance

3.4.2 In addition, Cyngor Gwynedd Council have produced supplementary planning guidance on Wildlife Sites, which has been reviewed as part of this assessment.

4. FIELD STUDY RESULTS

4.1 PHASE I HABITAT SURVEY

Site Summary

4.1.1 The Site is formed of two separate areas within the same planning application boundary: two small parcels to the north, and the main, larger area to the south. The northern parcels are comprised of marshy grassland and amenity grassland of limited species-richness. The main site to the south is dominated by semi-natural woodland, some of which likely resulting from initial plantation, but no clear indications of this beyond the dominance of non-native trees. The woodland offers potential bat habitat and includes areas of invasive species (rhododendron and variegated yellow archangel). Existing grassland parcels include amenity grassland and marshy grassland areas of limited species-richness. A river corridor (the Afon Colwyn) exists immediately adjacent to the eastern boundary.

4.1.2 Phase I map is shown in Figure 5 and Figure 6 , with target notes in Table 5, and a species list in Table 6. Photographs are provided in Table 7.

A1.1.1 Broadleaved woodland

4.1.3 The Site is dominated by semi-natural broadleaved woodland (non-priority habitat). The woodland is mixed in age with trees ranging approximately 30 – 80 years old, some trees scattered along the river are likely of a greater age and therefore of greater ecological value. Species include pedunculate oak, beech, silver birch, sycamore, rowan, alder, goat willow, hazel, and red oak, the latter of which being the dominate species to the southern block of the Site surrounding the existing hardstanding camping platforms and indicating possible former planting of this species.

4.1.4 Generally, the woodland forms a closed canopy with much bare ground surface at ground level. Scattered vegetation is present within the understorey and includes bluebell, bramble, bracken, rushes, fox glove, male fern, enchanter's nightshade, ivy and red campion, among other species. Invasive species were recorded throughout the area, with several occurrences of rhododendron (TN1) and a single area of yellow variegated archangel (TN3).

4.1.5 The occurrences of bluebell, particularly to the east of the Site, possibly indicate that the Site may have been previously wooded by woodland of a significant age, however, the presence of bluebell alone does not indicate ancient woodland.

4.1.6 A group of younger growth trees are present towards the central, northern portion of the Site (TN4), dominated by silver birch and goat willow and elder. Number of these trees (c.15) contain dense ivy and offer potential for bats (see 4.2, below).

B5 Marshy grassland

4.1.7 Two areas of marshy grassland were recorded. The first to the northeast of the main site boundary with an area dominated by soft rush, with tormentil and common sorrel present throughout. A fairly extensive area of rhododendron was observed to the northeast and southeast of the marshy grassland, adjacent to the river.

4.1.8 A second area of marshy grassland is situated to the north of the main site boundary. Species include soft rush, creeping buttercup, marsh thistle, rosebay willowherb, cuckoo flower, broadleaved dock, male fern, greater bird's-foot trefoil, and lady's mantle.

J1.2 – Amenity grassland

4.1.9 Two areas of amenity grassland were recorded. The first to the east of the main site boundary with an area dominated by annual meadow grass, Yorkshire fog and white clover. The grassland is used for pitching tents and is regularly mown.

4.1.10 A second area of amenity grassland is situated to the north of the main site boundary. The grassland is regularly mown and dominated by Yorkshire fog, annual meadow grass and white clover.

4.1.11 Both areas of grassland contain scattered trees including rowan, black pine, alder, and wild cherry.

J4 – Bare ground

4.1.12 A bare ground compacted stone track extends throughout the Site and forms the existing caravan platforms. This habitat is dominant beneath the closed woodland canopy.

Watercourses

4.1.13 A river corridor (the Afon Colwyn) is immediately adjacent to the eastern boundary. It is a fast-flowing natural river and priority habitat. The water course contains a continuous fridge of trees along its length and is considered to be an important resource for biodiversity.

4.1.14 Smaller, on-site tributaries are situated at the Site. They are shallow, fast-flowing with a rocky substrate and generally contain a range of ferns and bramble at the bank edges.

4.2 PROTECTED AND NOTABLE SPECIES

4.2.1 The below species results include results from AECOM's 'Beddgelert Ecology Planning Report, May 2017'. The results of the surveys, while 8-years old, are considered relevant as the Site conditions have not significantly changed in any way. Refer to AECOM report for full details.

Breeding Birds

4.2.2 A suite of bird surveys was undertaken during April - June 2016 by AECOM. A total of 26 bird species were recorded including one Amber-listed and seven Red-listed birds of conservation concern, however, most of these species were recorded north of the Site boundaries. Notable species included:

- Dunnock (*Prunella modularis*) (Amber-listed)
- Grey wagtail (*Motacilla cinerea*)
- Lesser redpoll (*Carduelis cabaret*)
- Willow-warbler (*Phylloscopus trochilus*)
- Mistle thrush (*Turdus viscivorus*)
- Pied flycatcher (*Ficedula hypoleuca*)
- Song thrush (*Turdus philomelos*)
- Spotted flycatcher (*Muscicapa striata*)

4.2.3 The results of the surveys, while 8-years old, are considered relevant as the Site conditions have not significantly changed in any way. Furthermore, the proposals are of such a scale and impact that breeding birds are unlikely to be significantly impacted.

Bats

4.2.4 A suite of bat surveys was undertaken during 2016 by AECOM. Surveys included dusk activity transect surveys, building and tree assessments, and activity loggers.

4.2.5 Species and activity recorded included:

- Common pipistrelle (Pipistrellus pipistrellus): foraging throughout the Site.
- Soprano pipistrelle (Pipistrellus pygmaeus): foraging throughout the Site.
- Myotis sp.: commuting along river corridor.
- Lesser horseshoe (Rhinoplophus hipposideros): commuting along river corridor.
- Brown long-eared bat (Plecotus auritus): likely foraging and commuting.
- Noctule (Nyctalus noctule): likely foraging and commuting.

4.2.6 No confirmed roosts were recorded at the Site, although it is considered likely that bats will be present at the Site using suitable trees as required.

4.2.7 During the Ecoscope survey of May 2024, a number of marginally 'low' (PRF-I) bat-suitable trees were identified (see TN2, TN4 & TN6), owing to the coverage of dense ivy.

Badgers

4.2.8 No evidence of badgers was observed within 30m of the Site boundaries, although the Site is suitable to support badgers.

Hazel Dormouse

4.2.9 Hazel dormouse (*Muscardinus avellanarius)* surveys were undertaken during 2016 by AECOM. A total of 140 nuts were inspected with no evidence of dormouse recorded.

4.2.10 No records for hazel dormouse were retrieved within the data trawl.

Otter and Water Vole

4.2.11 No evidence of otter (*Lutra lutra*), including holts, spraints, prints, or feeding remains, was observed during the survey although otter is considered highly likely to use the adjacent watercourse.

4.2.12 The watercourses surrounding and within the Site were considered unsuitable to support water vole given the rocky substrate and fast flow. No records of water vole were retrieved in the data trawl.

Reptiles & Amphibians

4.2.13 The Site has limited suitability to common reptiles, although it is largely overshaded, there are basking opportunities and numerous potential refugia throughout. As such their presence cannot be excluded.

4.2.14 While there is a lack of ponds, common amphibians are likely to be present within the woodland and marshy grassland habitats where damper areas persist.

Table 5 – Target notes and descriptions

Target note no.	Description
1	Invasive species. - rhododendron stands.
2	Oak tree offering low (PRF-I) bat roost potential.
3	Invasive species. – variegated yellow archangel
4	Group of young trees (c.15) with dense ivy-covered trees offering 'low' (PRF-I) bat roost potential.
5	Bluebells
6	Group of young trees (c.3) with dense ivy-covered trees offering 'low' (PRF-I) bat roost potential.

Table 6 – Species list

Common name	Latin name	Common name	Latin name
Alder	*Alnus glutinosa*	Hawthorn	*Crataegus monogyna*
Annual meadow grass	*Poa annua*	Hazel	*Corylus avellana*
Ash	*Fraxinus excelsior*	Herb robert	*Geranium robertianum*
Beech	*Fagus sylvatica*	Holly	*Ilex aquifolium*
Black bindweed	*Fallopia convolvulus*	Ivy	*Hedera helix*
Black knapweed	*Centuarea nigra*	Lady's mantle	*Achmilla sp*
Black pine	*Pinus nigra*	Male fern	*Dryopteris filix-mas*
Blackthorn	*Prunus spinosa*	Marsh thistle	*Cirsium palustre*
Bluebell	*Hyacinthoides non-scripta*	Nettle	*Urtica diocia*
Bracken	*Pteridium aquilinum*	Pedunculate oak	*Quercus robur*
Bramble	*Rubus fruticosus agg.*	Pignut	*Conopodium majus*
Broad leaved dock	*Rumex obtusifolia*	Red campion	*Silene dioica*
Cleavers	*Galium asparine*	Red oak	*Quercus rober*
Common chickweed	*Stellaria media*	Rhododendron	*Rhododendron ponticum*
Common hogweed	*Heracleum sphondylium*	Ribwort plantain	*Plantago lanceolata*
Common ragwort	*Senecio jacobaea*	Rosebay willowherb	*Chamaenerion angustifolium*
Common sorrel	*Rumex acetosella*	Rowan	*Sorbus aucuparia*
Creeping buttercup	*Ranunculus repens*	Male scaly-fern	*Dryopteris afiinis*
Cuckoo flower	*Cardamine pratensis*	Silver birch	*Betula pendula*
Dandelion	*Taraxacum officinale agg*	Soft rush	*Juncus effusus*
Elder	*Sambucus nigra*	Sweet vernal	*Anthoxanthum odoratum*
Enchanter's nightshade	*Circaea lutetiana*	Sycamore	*Acer pseudoplatanus*
False oat-grass	*Arrhenatherum elatius*	Tormentil	*Potentilla erecta*
Foxglove	*Digitalis purpurea*	White clover	*Trifolium repens*
Germander speedwell	*Veronia chamaedrys*	Wild cherry	*Prunus avium*
Goat willow	*Salix caprea*	Yarrow	*Achillea millefolium*
Great bird's-foot trefoil	*Lotus pedunculatus*	Variegated yellow archangel	*Lamiastrum galeobdolon argentatum*
Greater stitchwort	*Rabelera holostea*	Yorkshire fog	*Holcus lanatus*
Ground ivy	*Glechoma hederacea*		

Table 7 – Site photographs

	
Photograph 1: Amenity grassland and proposed area of 'Natural Play' north of the main site.	**Photograph 2:** Marshy grassland and proposed area of 'New Reception Building north of the main site.
	
Photograph 3: Group of 'low' (PRF-I) graded, ivy-covered trees at TN4	**Photograph 4:** Variegated yellow archangel at TN3
	
Photograph 5: Rhododendron (TN1)	**Photograph 6:** Rhododendron (TN1)

	
Photograph 7: Marshy grassland within main site.	**Photograph 8:** Amenity grassland within main site.
	
Photograph 9: Broadleaved woodland area with bluebells at TN5 adjacent to river.	**Photograph 10:** Existing hardstanding within broadleaved woodland, and location for proposed units.
	
Photograph 11: Rhododendron (TN1) along western boundary.	**Photograph 12:** Bluebells (TN5) along western boundary.

	
Photograph 13: Small tributary running through the Site.	**Photograph 14:** Adjacent river corridor with mature oak trees.

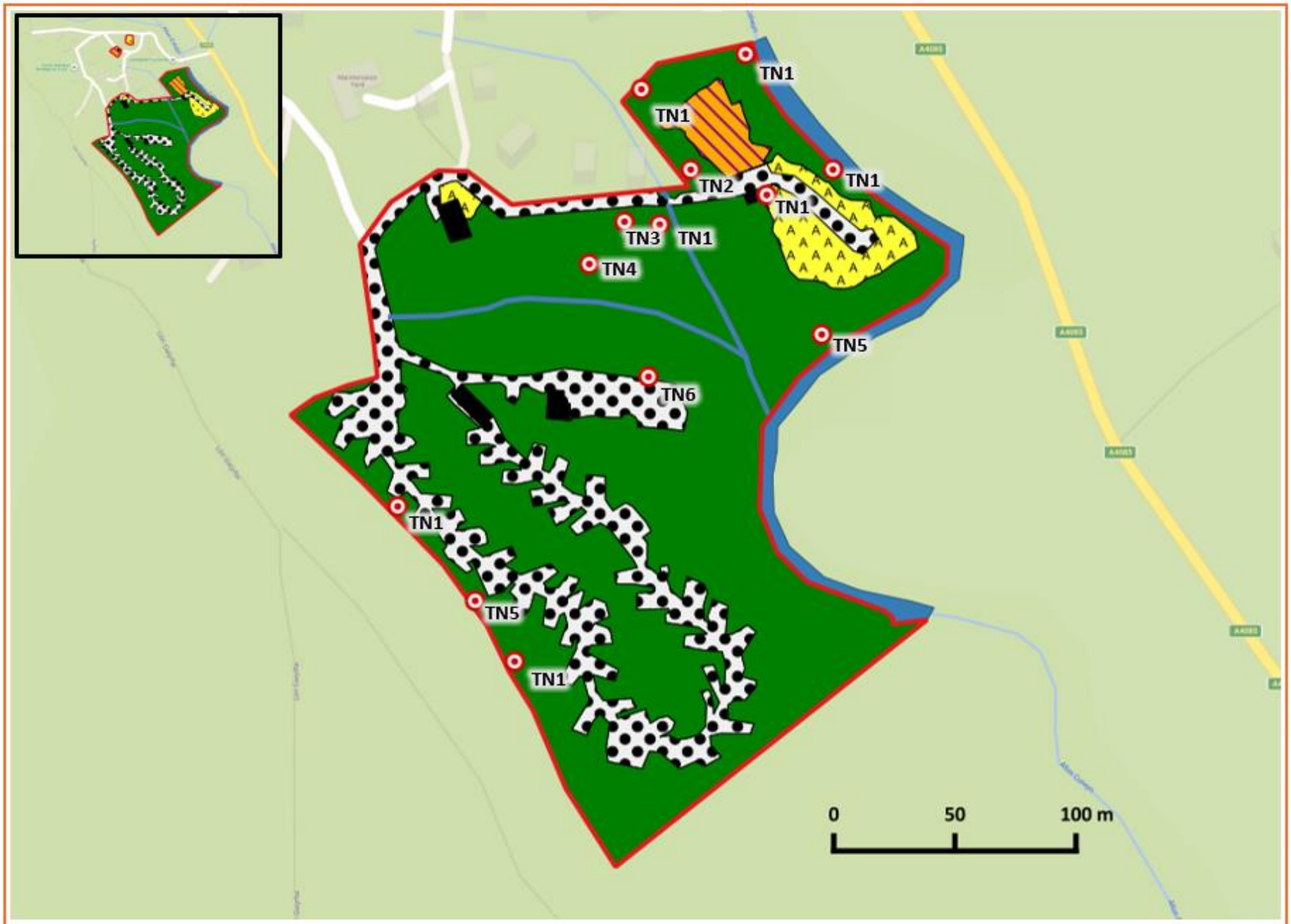

Figure 5: ***Phase I Survey – main site***

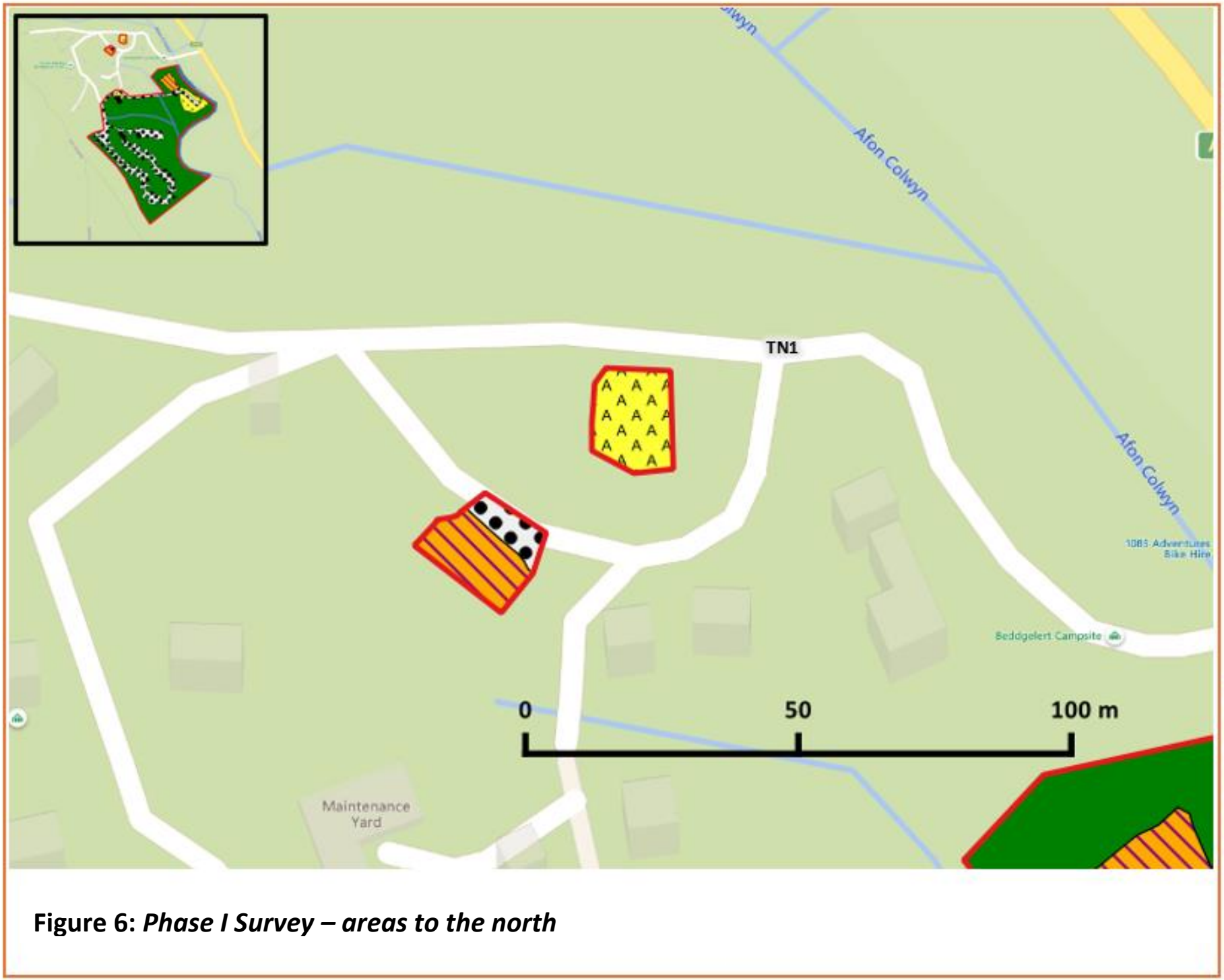

Figure 6: ***Phase I Survey – areas to the north***

5. ECOLOGICAL ASSESSMENT

5.1 SUMMARY OF ECOLOGICAL IMPACTS

5.1.1 A summary of ecological receptors which may be affected by proposals is provided in Table 8, below. Features and their reasons for exclusion are provided in Table 9.

Table 8 – Summary of ecological receptors, their likely impacts from proposals and recommendations

Receptor	Status	Potential Impact	Recommendation
Bats	• Roosting, foraging and commuting opportunity.	• Commuting and foraging habitat loss • Unnecessary illumination	• Any lighting to be sensitively designed (BCT GN08/23). • Construction during daylight hours. • 'Low' graded trees to be soft-felled where removal is req.
Breeding birds	• Nesting opportunity throughout the Site.	• Active nests/young may be impacted by construction.	• Avoid nesting season or SQE to survey site prior to construction.
Otter	• Foraging and commuting habitat within watercourse to east.	• Risk of animals being trapped in excavation.	• Provide means of escape for any excavations.
Reptiles & Amphibians	• Presence for common species cannot be discounted.	• Injury or jilling during construction within damper areas.	• Works to follow RAMs.
Notable plants	• Bluebells present on Site (local priority species)	• Loss of plant from the Site.	• Retain bluebell populations, where possible. • Micro-site cabins to avoid bluebells (if to be impacted)
Invasive species	• Rhododendron and variegated yellow archangel present at Site.	• Spread of invasive species offsite.	• Method Statement/ CEMP: Biodiversity
Priority Habitat	• Priority habitat adjacent to Site (river).	• Construction may cause pollution event.	• Method Statement/ CEMP: Biodiversity
Net Benefit for biodiversity	• Birds	• Nesting box provision	
	• Bats	• Provision of bat boxes	

Receptor	Status	Potential Impact	Recommendation
	• Reptiles & amphibians	• Reptile/amphibian refugia	
	• Habitat	• Enhancements to existing/retained woodland.	

Table 9 – Ecological features excluded from further assessment

Receptor	Reasons for omission
Designated sites	No designated sites likely to be impacted due to the distance, scale, and type of proposals (no important bat habitat likely to be lost).
Non-designated sites	Sites unlikely to be impacted due to the distance, scale, and type of proposals.
Badger	No evidence of badger at the Site.
Hazel dormouse	No records or evidence of hazel dormouse at the Site.
Great crested newt	No records or suitability to GCN at the Site.
Water vole	No records or evidence of water vole at the Site.

5.2 BATS

Status

5.2.1 Foraging and commuting opportunity throughout the Site.

5.2.2 'Low' (or PRF-I) bat potential trees are within the Site boundaries designated for their ivy coverage. A group of c.15 'low' (or PRF-I)-potential trees are situated at TN4, some of which may be lost to the proposals.

5.2.3 All British bat species receive full protection under the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2017 (as amended).

Unmitigated Impact

5.2.4 Foraging and commuting paths may be illuminated during the construction and operational phases.

5.2.5 'Low' (or PRF-I) potential trees may be lost to the proposals.

Recommendations

5.2.6 Any lighting proposals (where necessary) should be designed in accordance with BCT GN08/23 – Bats and Artificial Lighting at Night. In particular, all natural habitats should remain unilluminated. This is of particular importance to the river corridor and woodland.

5.2.7 The construction process should only be undertaken during daylight hours so that illumination during construction is not required.

5.2.8 Any ivy-covered trees offering 'low' (or PRF-I) bat roost potential that need to be moved to facilitate proposed cabins should be soft-felled in the manner below.

Soft-felling methodology

- Ivy should be cut at the base of the tree during the summer period so that the ivy dies, and the leaves are reduced, thus reducing the suitability to potential roosting bats.
- Any soft-felling should be undertaken during the autumn or spring months.
- Where possible, ivy should be carefully cut with pruners and stripped from branches and trunks before sections of limbs are cut.
- For sections where the ivy cannot be fully stripped prior to felling, limbs should be carefully cut in sections and lowered carefully to the ground by ropes.
- The sections that have been lowered to the ground should be left for a period of 24-48hours before being removed to allow any animals to escape.

5.3 BREEDING BIRDS

Status

5.3.1 The Site and surrounds contain Amber and Red species listed on BoCCW.

5.3.2 Breeding birds nests, eggs and young protected under the Wildlife and Countryside Act (1981) (as amended).

Unmitigated Impact

5.3.3 An active bird's nest or eggs may be damaged or destroyed or its young injured during construction should vegetation require removal.

Recommendations

5.3.4 Works affecting potential bird breeding habitat should take place outside the active bird breeding period (1st March – 31st August), or;

5.3.5 A suitably qualified ecologist should survey the area of impact immediately prior to the commencement of works. Should an active nest be found then the area should be cordoned off and left until birds area confirmed as no longer breeding and any young have fully fledged.

5.4 OTTER

Status

5.4.1 Off-site foraging and commuting habitat for otter within the river corridor. Otter cannot be discounted from foraging across the Site.

5.4.2 Otter receives full protection under the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2017 (as amended).

Unmitigated Impact

5.4.3 Otter may be trapped within an on-site excavation during construction.

Recommendations

5.4.4 Any excavations left open overnight should either be sufficiently covered or contain a ramp or means of escape.

5.5 PLANTS

Status

5.5.1 No specially protected plants are present on Site. However, bluebells are within the grassland on Site and are partially protected from selling only under the Wildlife and Countryside Act (1981) (as amended). In addition, they are a Priority Species in Gwynedd whereby action plan objectives include the protection, maintenance and enhancement of existing populations of bluebell.

Unmitigated Impact

5.5.2 Bluebells may be lost or damaged during construction.

Recommendations

5.5.3 Areas of bluebells should be avoided, where possible for example, by micro-siting cabins to reduce loss.

5.5.4 Where bluebells are likely to be impacted by proposals, turfs should be lifted and re-instated on Site within suitable areas, guided by a Method Statement.

5.6 PRIORITY HABITATS

Status

5.6.1 The off-site river corridor is a priority habitat and immediately adjacent to the eastern Site boundary.

Unmitigated Impact

5.6.2 Unmitigated, the construction process may result in a pollution event that may impact the sensitive watercourse.

Recommendations

5.6.3 The construction process should be supported by a Method Statement or CEMP: Biodiversity to specify how the river will be protected during construction. Measures should include:

i) Any hazardous substances, chemicals/fuel, and wet materials must be stored within a confined compound, suitably bunded.

ii) Spillage prevention kits and methodologies appropriate to any substance kept on site must be in place in the event of a spillage.

iii) All washing of machinery and equipment should be undertaken suitably distanced from the river within a confined area, suitably bunded to ensure any washings do not flow towards any watercourse.

iv) Concrete, and any other similar construction material, should be brought to the site pre-mixed and the area suitably bunded when pouring wet materials.

v) Where traffic/machinery activity is likely to cause dust, road wetting and tyre washing bays should be installed, ensuring no flow of washings towards a watercourse.

vi) When cutting concrete or other materials, ventilation or wet cuts should be employed to prevent dust.

5.6.4 In the event of an accident or spill:

i) Spill kits should be in place at all times on site.

ii) Should a spillage event occur, the nominated ecologist should be notified immediately, and remediation measures put into place.

5.7 INVASIVE SPECIES

Status

5.7.1 Rhododendron and variegated yellow archangel are present within the site boundaries at TN1 and TN3. Both species are listed on Schedule 9, Part II of the WCA, 1981, making it illegal to cause the spread of the plant into the wild.

Unmitigated Impact

5.7.2 Invasive species may spread further within the Site and potentially offsite.

Recommendations

5.7.3 Where invasive species are likely to be impacted by the construction phase, an invasives species specialist should sought to eradicate the existing stands of invasive species or to effectively deal with any contaminated material (i.e. soil) in a legal manner.

5.7.4 A Method Statement should support the construction process to detail how the spread of invasive species will be mitigated during the construction process.

5.8 REPTILES & AMPHIBIANS

Status

5.8.1 Limited opportunity for common reptiles is present on Site.

5.8.2 Opportunity for common amphibians exits within damper areas of the Site.

Unmitigated Impact

5.8.3 Generally, the proposals are within pre-existing areas of hardstanding with limited impact to vegetation. However, common reptiles and amphibians may be killed or injured during construction in any areas where vegetation may be impacted by proposals.

Recommendations

5.8.4 A Method Statement detailing Reasonable Avoidance Measures (RAMs) should be provided to contractors prior to the start of works.

5.9 NET BENEFIT FOR BIODIVERSITY

5.9.1 Paragraph 6.4.3 of PPW requires the planning system to ensure that overall, there is a net benefit for biodiversity. This may be achieved via protecting against the loss and securing enhancements for ecosystems and ecological features.

5.9.2 There will be minimum habitat loss on site with proposed new cabins to be installed within existing hardstanding/bare ground habitats. However, approximately 3no. units are proposed within marshy grassland and amenity grassland areas, and c. 8no. units within existing woodland areas.

5.9.3 The units should be micro-sited to avoid tree/vegetation loss, where possible, however, some loss is expected (further described within the Green Infrastructure Statement).

5.10 OPPORTUNITIES FOR BIODIVERSITY ENHANCEMENT

5.10.1 In addition to woodland enhancements, other opportunities for biodiversity enhancements exist on-site with the addition of ecological features, as follows:

- Schwegler 1FF Bat Boxes: 5no.

- Schwegler 2F Bat Boxes: 5no.
- Schwegler 1B Bird Boxes: 5no.
- Schwegler Open-fronted Bird Boxes: 5no.

5.10.2 In addition, a minimum of 2no. reptile refugia/hibernacula should be provided within the Site boundaries, the location and design to be guided by a SQE (refer to Figure 7 for design).

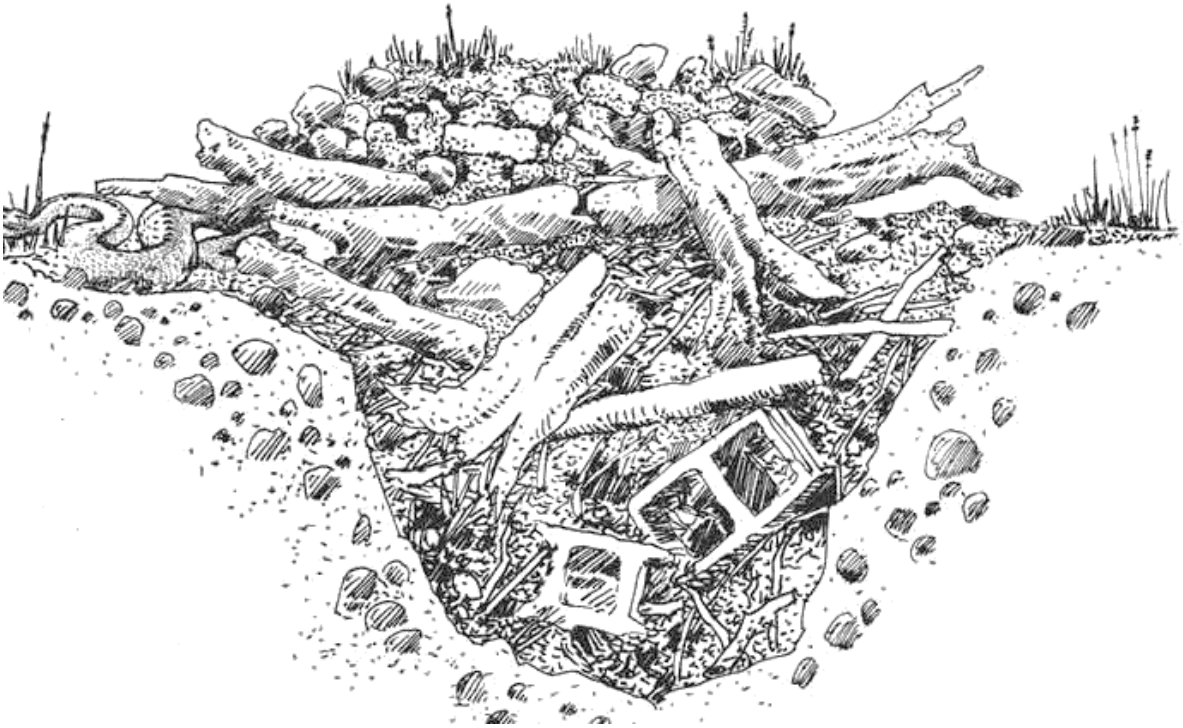

Figure 7: ***Reptile refugia/hibernacula design***

5.11 GREEN INFRASTRUCTURE STATEMENT

5.11.1 Under the recently updated Planning Policy Wales[5] (PPW), all planning applications should be submitted with a green infrastructure statement (GIS). It must be proportionate to the nature and scale of the development and describes how green infrastructure is incorporated into the proposal. The GIS should describe how proposals follow the 'Step-Wise' Approach' as detailed under paragraph 6.4.15 of PPW.

Baseline

5.11.2 The baseline is described under section 4 of this report. In addition to the ecological survey and assessments described within this report, an Arboricultural Assessment has been undertaken by Tree Solutions (September 2024, reference: 24/AIA/SNPA/23 (Rev A)). In summary it comprises:

- A1.1.1 Broadleaved woodland

[5] **Planning Policy Wales: Edition 12** February 2024. Welsh Government.

- B5 Marshy grassland
- J1.2 – Amenity grassland
- J4 – Bare ground
- Watercourses

Avoidance

5.11.3 Proposals have been designed as to limit habitat loses, with proposed cabins being largely located within existing clearings upon existing hardstanding habitats. However, there will be an inevitable loss of trees to fully accommodate the proposals.

5.11.4 Mitigation has been included to avoid impacts to species. These include:

- Soft-felling of 'low', or PRF-I, trees.

Habitat Loss

5.11.5 As reported within the Arboricultural Assessment, there will be a loss of trees to facilitate proposals. Tree loss will be approximately 40-50 individual trees which are mostly early-mature specimens. The Arboricultural Assessment goes on to state that there will be no loss of landscape or amenity value due to the removal of trees, and further states that enhancements will be reached via the creation of open glades at the location of cabins, lodges and roads, and opportunity for canopy establishment adjacent to established glades. There will be additional losses to amenity grassland and marshy grassland habitats, and hardstanding habitat of negligible ecological value. In summary:

- Woodland/trees: c.40-50 individual trees
- Amenity grassland: c.254m^2
- Marshy grassland: c.202m^2.
- Hardstanding: c.8000m^2

5.11.6 The loss of these habitats are considered as minimal in an ecological context, with the location of habitat removal having a negligible impact on the wider ecological landscape and will not result in extensive loss, fragmentation or isolation of natural habtiats.

Habitat Creation

5.11.7 Proposals include the removal of existing hardstanding habitat to c.8000m^2 which will be replanted. An undefined area of habitat along the eastern edge of the Site where camping facilities will be relocated will also be restored to vegetation.

5.11.8 Planting details are not yet defined however, it is considered that the areas available will provide opportunities to provide clear net gains for biodiversity. The following principles should be followed when providing habitat:

- Planting should prioritise like-for-like replacement, or better (i.e. prioritise tree and woodland planting).
- Species should include native species of local provenance.
- Planting mixes should maximise the number of species to create diverse habitats.
- Habitats should be managed in the long-term and for the duration of the development.

5.11.9 The provision of habitat, creating like-for-like replacement, or better, will strengthen the ecological status

Habitat Enhancements

5.11.10 There is opportunity to enhance the extensive retained woodland which dominates the Site. Specific enhancements should be detailed within a standalone Habitat Management Plan, but may include:

- Removal of invasive species
- Creating areas of temporary open space
- Promoting three classes of woodland regeneration (seedlings, saplings & young trees)
- Introducing a recognisable woodland NVC plant community at ground level
- Diversifying the vertical structure of the woodland primarily via an established understorey
- Providing standing deadwood within 50% of the woodland

GIS Summary and Recommendations

- Minimal habitat losses will result from proposals, impacting woodland, amenity grassland, marshy grassland, and hardstanding.
- An extensive area of existing hardstanding will be removed and replanted under the proposals.
- Planting should be like-for-like (or better) of the habitat lost and should maximise native species.
- Habitat management should be for the duration of the development.
- Additional opportunity exists to enhance retained habitat which should be detailed within a Habitat Management Plan.
- Wildlife boxes have been recommended in addition, to benefit species.
- 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.

6. APPENDICES

6.1 APPENDIX I: LEGISLATION

The Environment Act (Wales) 2016

6.1.1 Puts in place legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way includes:

- Section 6 under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) requiring that public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so, promote the resilience of ecosystems.
- Section 7 replaces the duty in section 42 of the NERC Act 2006. The Welsh Ministers will publish, review and revise lists of living organisms and types of habitat in Wales, which they consider are of key significance to sustain and improve biodiversity in relation to Wales. The Welsh Ministers must also take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.
- Sustainable Management of Natural Resources: sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory principles of SMNR defined within the Act. The three main components include:
    - The State of Natural Resources Report (SoNaRR): Sets out the state of Wales' natural resources).
    - Natural Resources Policy (NRP): Produced by Welsh Government, sets out priorities, risks and opportunities for the sustainable management of natural resources taking into account the findings of the SoNaRR report.
    - Area Statements: Produced by NRW to implement one or more of the priorities and opportunities outlined in the NRP at an appropriate spatial scale. They translate the high level strategic priorities while taking into account local needs, opportunities and pressures.

Conservation of Habitats and Species Regulations 2017 (as amended)

6.1.2 These Regulations consolidate the Conservation (Natural Habitats, &c.) Regulations 1994 and amend the 2010 Regulations, and together they transpose the European Habitats Directive into domestic law. The Regulations provide for the designation and protection of 'European sites' (referred to in this assessment as international or designated sites), the

protection of 'European protected species', and the adaptation of planning and other controls for the protection of such.

6.1.3 Under the Regulations, UK competent authorities have a general duty to have regard to the EC Habitats and Birds Directives. They require competent authorities to consider or review planning permission, applied for or granted, affecting a European site, and, subject to certain exceptions, restrict or revoke permission where the integrity of the site would be adversely affected. Under Regulation 63, where any proposed plan or project is likely to have an effect on a Natural 2000 site or qualifying feature for a site, then the competent authority (normally the local planning authority) will carry out an Appropriate Assessment of those effects, referred to as a Habitats Regulations Assessment (HRA).

Species

6.1.4 The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority, including the planning authority, is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild populations of the species concerned: these three elements form the basis of the three derogations ‘tests’ to be applied to satisfy European legislation.

Well-being of Future Generations (Wales) Act

6.1.5 Wales also has a key piece of overarching legislation called the Well-being of Future Generations (Wales) Act, introduced in 2015, that requires national government, local government, local health boards and other specified public bodies to carry out sustainable development and work towards objectives that contribute to seven well-being goals. Sustainable development in the Act means “the process of improving the economic, social, environmental and cultural wellbeing of Wales by taking action, in accordance with the sustainable development principle (i.e. not compromising the ability of future generations

to meet their needs), aimed at achieving the well-being goals. The seven wellbeing goals are:

- A Prosperous Wales
- Resilient Wales
- Healthier Wales
- More Equal Wales
- Cohesive Communities
- Vibrant Culture and Thriving Welsh Language
- Globally Responsible Wales

Wildlife and Countryside Act 1981

6.1.6 The principle statutory instrument that governs nature conservation in England is the Wildlife and Countryside Act 1981 as amended (WCA 1981).

6.1.7 The WCA 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and the Birds Directive in Great Britain. It is complimented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act, and the Habitats Regulations 2017 (as amended), which implement the Habitats Directive.

6.1.8 Containing four Parts and seventeen Schedules, the Act covers protection of wildlife (birds, and some animals and plants), the countryside, National Parks, and the designation of protected areas, and public rights of way.

6.1.9 Amendments to the Act have been made and there is a statutory quinquennial review of Schedules 5 and 8 (protected wild animals and plant respectively), undertaken by the country agencies and co-ordinated by the Joint Nature Conservation Committee. There have been 6 reviews with the 7th commenced in 2021.

Protection of Badgers Act 1992

6.1.10 There are very few Acts of Parliament that are dedicated to one species with conservation as part of the aim. This Act supplements the WCA 1981 by affording protection to badgers against disturbance and their setts against unlawful damage and destruction. It provides a licensing system to allow works to proceed in a sensitive manner.

Countryside and Rights of Way (CRoW) Act 2000

6.1.11 The CRoW Act 2000 places a duty on Government Departments and the National Assembly for Wales to have regard for the conservation of biodiversity and maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the 1992 Rio Convention on Biological Diversity. The Act makes various amendments to the WCA 1981 including increasing SSSI protection, management and policing.