

PLANNING

ADVENTURE PARC SNOWDONIA, DOLGARROG PLANNING STATEMENT GLOBAL SHRED VENTURES LTD November 2024 2024.104_02

DRAFT ISSUED FOR PRE-APPLICATION CONSULTATION



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1. Introduction

- 1.1 This Planning Statement accompanies an application for the redevelopment of the existing surfing lagoon at Adventure Parc Snowdonia with updated wave generation technology to create a new surfing experience, engineering works to infill part of the surfing lagoon together with associated landscaping and siting of 21 lodges. The proposal also includes the refurbishment and extension to the existing Adrenaline Indoors building at Adventure Parc Snowdonia to house a new leisure attraction along with all associated site infrastructure and external works.
- 1.2 The application site forms part of the Adventure Parc Snowdonia site, formerly known as Surf Snowdonia, which opened in 2015 as a signature attraction to create an activity of significance that would draw a new market to North Wales with circa 50,000 visitors. The development of the site by the Ainscough family in 2015 was not without its challenges, with site contamination, extensive concrete slab remains from the former factory days, together with the site's location largely in a flood plain. Alongside pioneering the new inland surfing technology that had never been commercially delivered before in the world, the site required significant investment levels. However, the family were committed to the project long term to give the site a future.
- 1.3 Unfortunately, the regular mechanical failures of the surf technology installed at Surf Snowdonia led to eight faltering seasons (yet successful in many other ways) and the business had to take the tough decision to close the surf lagoon in mid-2023. The site now has the opportunity to house another world class visitor attraction using a new surfing technology.
- 1.4 The application site is within the ownership of Adventure Parc Snowdonia Ltd who have been working closely with the applicant, Global Shred Ventures Ltd to develop a proposal which would redevelop parts of the Adventure Parc Snowdonia site to bring the existing surfing lagoon back into use by way of introducing a new wave generation technology (Wavegarden's 'The Cove' surfing technology) which is now tried, tested and proven to create a new surfing experience at the site. Part of the existing surfing lagoon would be filled to create a new plateau to accommodate a new lodge development, together with a shore-side/beach area for visitors to enjoy.
- 1.5 Alongside this, alterations, refurbishment and extensions are proposed to the existing Adrenaline Indoors building at the site, to accommodate a new indoor leisure and tourism attraction, known as 'Snowtunnel'.

- 1.6 The proposal represents an investment of £21 million, which would offer 75 new FTE jobs, 20 of which would be expected to be full-time roles.
- 1.7 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 site area over 1ha. The proposed development exceeds the 1ha site threshold.
- 1.8 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'.
- 1.9 This Planning Statement is issued as part of a suite of documents for Pre-Application Consultation prior to the submission of a formal planning application.
- 1.10 This Statement details the site's characteristics, the proposals, the relevant planning policies and the application's main considerations. This Planning Statement should be read alongside other planning application documents including:
 - Design and Access Statement;
 - Landscape and Visual Impact Assessment (LVIA);
 - Flood Consequence Assessment (FCA);
 - Drainage Strategy;
 - Transport Note;
 - Ecological Assessment;
 - Noise Impact Assessment;
 - Air Quality Assessment; and
 - Lighting details.

2. The site and context

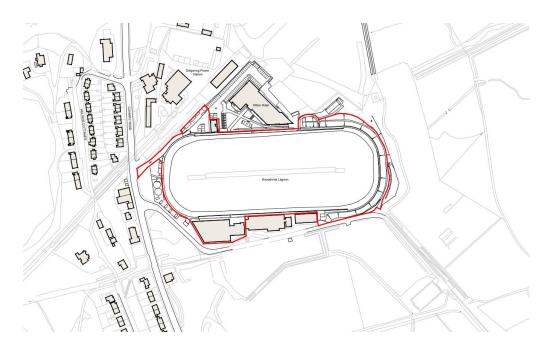
- 2.1 The application site comprises part of the Adventure Parc Snowdonia (formerly Surf Snowdonia), which lies within the development boundary of Dolarrog, within the Conwy Valley. Adventure Parc Snowdonia is a previously developed site which previously accommodated a former aluminium works factory, before it was developed by the Ainscough family around 10 years ago to provide an inland surf lagoon.
- 2.2 Adventure Parc Snowdonia's location in the context of its local surroundings is identified in Figure 2.1, whilst the extent of the application site is identified in Figure 2.2.

Figure 2.1 Aerial image identifying the location of Adventure Parc Snowdonia in the context of its local surroundings



- 2.3 The application site comprises the external surf lagoon and pathway areas around it, the Adrenaline Indoors building located to the south-western corner of the lagoon, access to the site from Conwy Road and an small area to the north-west of the lagoon including an existing building associated with the surf lagoon.
- 2.4 The two other buildings to the south of the surf lagoon known as the 'Watersports reception and surf side café bar' and the 'Surf Academy' do not form part of the planning application.

Figure 2.2 Location plan identifying the extent of the application site in red



- 2.5 Hilton Garden Inn Snowdonia lies to the north of the application site and lies outside of the application site. There are also up to 36 consented holiday pods within the Adventure Parc Snowdonia site, however, these do not form part of the planning application and fall outside the application site.
- Vehicular access to Adventure Parc Snowdonia is provided by an existing access point from Conwy Road onto Clark Street which runs to the south of the surf lagoon and existing buildings. There is also a separate vehicular access close to the access to Dolgarrog Waterworks site, which provides access to Hilton Garden Inn Snowdonia. The application site includes the access to serve the proposed holiday lodges, which is the same vehicular access that serves Hilton Garden Inn Snowdonia. There is a bus stop located directly near the site access along Conwy Road.
- 2.7 There are residential dwellings to the west of Adventure Parc Snowdonia on the opposite side of Conwy Road. There are also a small number of buildings opposite Clark Street which provide a shop, café and salon.
- 2.8 The application site as well as the wider Adventure Parc Snowdonia site is designated as a mixed housing/tourism site within the adopted Conwy Local Development Plan (LDP). It also lies within Cadw's Registered Lower Conwy Valley Historical Landscape. Adventure Parc Snowdonia does not form part of the Conwy Valley Special Landscape Area in the local plan but adjoins its boundary. Eryri National Park lies immediately to the west, on the opposite side of Conwy Road.

2.9 According to Natural Resources Wales (NRW's) Development Advice Map, the vast majority of the application site lies within a C2 flood risk area (blue) as per map in Figure 2.3. The yellow area identifies Zone B (areas known to have flooded in the past).

Suffsnowdonia
St Mary's
Church
Play Space

Coed
Dolgarrog

Dolgarrog

Figure 2.3 Extract of DAM showing the flood risk

2.10 The vast majority of the application site is also shown to be within Flood Zone 3 and some in Flood Zone 2 of the more recently updated Flood Maps for Planning by NRW as can be seen in Figure 2.4. Dark blue – flood zone 3, light blue – flood zone 2.



Figure 2.4 Extract of Flood Maps for Planning by NRW

2.11 The application is accompanied by a Flood Consequence Assessment (FCA) which presents flood modelling which demonstrates that NRW's DAM and Flood Maps for Planning are not accurate, based on the site's land levels and consented land levels.

Planning history

2.12 The application site and the wider Adventure Parc Snowdonia site benefits from planning permission for development that is currently on site. A summary of main relevant planning consents is provided in Table 2.1 below.

Table 2.1 Summary of main relevant planning history in relation to the application site and the wider Adventure Parc Snowdonia site

0/47343 – Retrospective planning application for four accommodation pods, two storage pods and a seasonal tipi on land at Adventure Parc Snowdonia: Granted 09/07/2020.

0/47120 – Variation of condition nos 2 & 3 of planning approval 0/45913 (Relocation of 30 no. camping pods and erection of associated ablution block and all associated pathways and external lighting) to allow for the relocation of camping pods: Granted 11/04/2024.

0/41477 – Erection of events/academy building on land at the former aluminium works, Dolgarrog: Granted 10/04/2015.

0/41474 – Variation of condition no. 1 of planning permission granted under code ref. 0/40827 (the erection of an outdoor leisure complex (approval of reserved matters of the buildings, layout, access, appearance, scale and landscaping elements granted under code ref. 0/40530)) to allow for changes to approved plans: Granted 10/04/2015.

0/41474 – Variation of condition no. 1 of planning permission granted under code ref 0/40827 (The erection of an outdoor leisure complex (Approval of Reserved Matters of the buildings, layout, access, appearance, scale and landscaping elements granted under code: 0/40530)) to allow for changes to approved plans: Granted 02/04/2015.

0/41449 - Approval of reserved matters application in respect of planning application 0/40530 for the campsite and activity lagoon: Granted 25/03/2015.

0/40827 – The erection of an outdoor leisure complex (approval of reserved matters of the buildings, layout, access, appearance, scale and landscaping elements granted under code ref. 0/40530): Granted 18/08/2014.

0/40530 – The erection of an outdoor leisure complex including water sport and training facilities with associated Use Class A1 (retail), A3 (food and drink), D2 (assembly and leisure) development, accommodation facilities (self-catering lodges and campsite), infrastructure, landscaping and ancillary works (outline planning application): Granted 10/06/2014.

0/40529 – Infrastructure provision (including operational works), landscaping and access associated with the development of the site for an outdoor leisure complex (including accommodation facilities and ancillary works): Granted 10/06/2014.

3. The proposed development

- 3.1 The application relates to a redevelopment proposal of the existing surfing lagoon at Adventure Parc Snowdonia with updated wave generation technology to create a new surfing experience, engineering works to infill part of the surfing lagoon together with associated landscaping and siting of 21 lodges. The proposal also includes the refurbishment and extension to the existing Adrenaline Indoors building at Adventure Parc Snowdonia to house a new leisure attraction along with all associated site infrastructure and external works.
- 3.2 An extract of the Proposed Site Plan is provided in Figure 3.1 below.

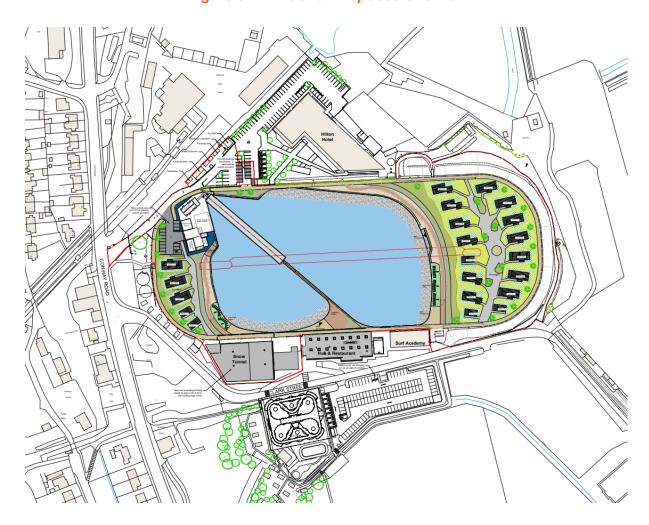


Figure 3.1 Extract of Proposed Site Plan

3.3 The proposed development comprises of three main features as detailed below:

1. New wave generation technology to offer a new surfing experience

- 3.4 The application site is within the ownership of Adventure Parc Snowdonia Ltd who have been working closely with the applicant, Global Shred Ventures Ltd, to develop a proposal which would redevelop parts of the Adventure Parc Snowdonia site to bring the existing surfing lagoon back into use by way of introducing a new wave generation technology (Wavegarden's 'The Cove' surfing technology) which is now tried, tested and proven to create a new surfing experience at the site.
- 3.5 This would involve the removal of the existing pontoon which creates the waves which runs along the centre of the existing lagoon. The proposed development would include the siting of a new structure to generate waves using Wavegarden's 'The Cove' surfing technology, which would cross the lagoon from the north-western corner to around halfway along the existing lagoon's southern boundary. This would create two separate surfing areas, with a smaller and shallower surf to the west and a larger and deeper surf area to the east.

2. Holiday lodge development

- 3.6 Engineering works are proposed to the easternmost part of the existing surfing lagoon in order to fill this part of the lagoon to create a new plateau to accommodate a new lodge development, together with a shore-side/beach area for visitors to enjoy. 16 lodges are proposed to be sited on the eastern side of the lagoon with a further five lodges proposed on the western side of the lagoon, to be sited on an another plateau following engineering works. Three different types of lodges are proposed as detailed in the Design and Access Statement. Of the consented 36 holiday units, 29 would be retained as part of this proposal, therefore resulting in a net increase of 14 units across the Adventure Parc Snowdonia site.
- 3.7 Land on the western side of the lagoon would also provide a service yard to serve the lagoon together with car parking spaces to serve the proposed lodges. Further car parking spaces would be provided to the north of the lagoon, following the demolition of an existing building associated with the surf lagoon, which is no longer required.
- 3. Alterations, refurbishment and extension to existing Adrenaline Indoors building to accommodate a new leisure tourism attraction
- 3.8 Alongside the new surfing experience and holiday lodges, alterations, refurbishment and extensions are proposed to the existing Adrenaline Indoors building at the site

(located near the lagoon's south-western corner) to accommodate a new indoor leisure and tourism attraction, known as 'Snowtunnel'.

- 3.9 Snowtunnel would be accommodated within the existing Adrenaline Indoors building but would require alterations and extension to the building in the form of raising and changing the roof level and form. It would provide snowboarders, skiers and other snow sports lovers the chance to participate in their sports all year round, anytime, in any weather, close to home. It brings to the snow industry, what wave pools and wind tunnels have brought to the surf and skydiving industries.
- 3.10 Further details regarding the design and appearance of the proposed development are provided in the Design and Access Statement.
- 3.11 Pre-application Enquiry discussions have been undertaken with the Local Planning Authority (LPA) and NRW prior to the commencement of PAC in relation to this proposal. Further consultation will be undertaken as part of the PAC prior to the submission of a formal planning application.

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

- 4.2 The proposal relates to a coaster kart development and relevant national planning policy is set out in:
 - Planning Policy Wales (PPW) Edition 12, (2024);
 - Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009);
 - TAN 11: Noise (1997);
 - TAN 12 'Design' (2016);
 - TAN 13: Tourism (1997);
 - TAN 15: Development and Floodrisk (2004);
 - TAN 18 'Transport' (2007);
 - TAN 20: 'Planning and the Welsh Language' (2017); and
 - TAN 23: Economic Development (2014).
- 4.3 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 4 Active and Social	The Active and Social theme covers the well-connected cohesive communities components of placemaking. These components are complementary to those of the Productive and Enterprising and Distinctive and Natural themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes. A Prosperous Wales can be promoted through the development of modern and connected infrastructure to allow everybody to have a good quality of	
	life by living in strong and safe communities, with access to decent jobs. A Resilient Wales is supported by protecting existing communities and natural environments while promoting well connected infrastructure and facilities closer to where people live.	
	The key issues in this Active and Social theme include: • tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of	

inclusive communities and the wider environment for good health and well-being;

- improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles which will assist in improving health and wellbeing;
- reducing reliance on travel by private car, and the adverse impacts of motorised transport on the environment and people's health, by prioritising and increasing active travel and public transport;

Active and social theme aims to:

ensure new development is located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, local services and community facilities. This will be achieved through integrating development with sustainable transport infrastructure and designing schemes in a way which maximises provision and use of sustainable forms of travel, including prioritising these modes over the private car.

Paragraph 4.1.10 advises that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

PPW Chapter 5 Productive and Enterprising Places

Chapter 5 of PPW relates to Productive and Enterprising Placemaking and Well-being.

Economic Development

Section 5.4 relates to Economic Development.

PPW provides clarity on which uses should be acceptable as part of promoting economic development in Paragraph 5.4.1. This refers to traditional employment land uses as B1, B2 and B8 Uses and endorses that uses such as retail (A1, tourism D2 and public services A2, should be included when considering the economic strategy. Paragraph 5.4.1 states that:

"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. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses."

Paragraph 5.4.2 states that;

"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... The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim... This section focuses primarily on traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in PPW."

Tourism

Section 5.5 relates to Tourism. PPW acknowledges that "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".

Paragraph 5.5.2 notes that 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. Appropriate tourism-related development in new destinations is encouraged.

Paragraph 5.5.4 is of relevance to the application site. It acknowledges that there will be scope to develop well-designed tourist facilities in urban areas, particularly if they help bring about regeneration of former industrial areas. The sensitive refurbishment and re-use of historic buildings also presents particular opportunities for tourism facilities in all areas.

Paragraph 5.5.7 states that planning authorities should adopt positive approaches to proposals which utilise previously developed or disused land and water bodies for tourism uses, particularly in relation to urban regeneration.

PPW Chapter 6 Distinctive and Natural Places

The Distinctive and Natural theme covers environmental and cultural components of placemaking.

A Prosperous Wales can be realised by valuing the quality of our landscapes and historic environment as important for tourism, business, local employment, locally sourced building products, in attracting inward investment and to be accessed, used and enjoyed by local communities.

A Healthier Wales can be achieved by enabling opportunities for connecting with the natural and historic environment, enabling access to tranquil areas, tackling airborne pollution and other environmental risks and the promotion of active travel and encouragement of healthier lifestyles with the benefit of improving physical and mental well-being.

A More Equal Wales can be achieved through facilitating access to the natural and historic environment for physical and social benefits especially where inequalities exist. Regeneration should promote beneficial use of

	historical mining and industrial legacies in a sensitive way to allow communities and the natural environment to thrive and significant tourism generators such as the Wales Coastal Path are protected and accessible by all.
	Development plan strategies, policies and development proposals should be formulated to look to the long term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments, ensuring their longevity in the face of change. This means both protecting and enhancing landscapes, habitats, biodiversity, geodiversity and the historic environment in their own right as well as other components of the natural world, such as water resources or air quality.
	Landscape The character and special qualities of all our places and landscapes, both urban and rural, can provide a strong sense of place, inspiration and belonging, and contribute to the distinctive cultural identity of Wales.
	All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.
TAN 5 Nature Conservation and Planning	Technical Advice Note 5 'Nature Conservation and Planning' provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
	Paragraph 1.6.1 states that; "Biodiversity conservation and enhancement is an integral part of planning for sustainable development. The planning system has an important part to play in nature conservation. The use and development of land can pose threats to the conservation of natural features and wildlife. Past changes have contributed to the loss of integrity of habitat networks through land-take, fragmentation, severance, disturbance, hydrological changes and other adverse impacts. But development can also present significant opportunities to enhance wildlife habitats and the enjoyment and understanding of the natural heritage."
TAN 11 Noise	Local planning authorities must ensure that noise generating development does not cause an unacceptable degree of disturbance. They should also bear in mind that if subsequent intensification or change of use results in greater intrusion, consideration should be given to the use of appropriate conditions.
TAN 12 Design	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.
	The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics

	and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.
	Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.
	Section 5.8 relates to rural areas and paragraph 5.8.1 identifies that; 'The special qualities of the rural landscape and coastline of Wales should be recognised. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development.'
TAN 13:	Tourism males a major contribution to the Welsh economy, provides
Tourism	employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas.
TAN 15: Development and Floodrisk	The general approach of PPW, supported by TAN 15, is to advise caution in respect of new development in areas at high risk of flooding by setting out a precautionary framework to guide planning decisions. The overarching aim of the precautionary framework is, in order of preference,
	 Direct new development away from those areas which are at high risk of flooding. Where development has to be considered in high risk areas (zone
	C) only those developments which can be justified on the basis of the tests outlined in section 6 and section 7 are located within such areas.
TAN 18 Transport	TAN 18 has also been taken into consideration. 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.
	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.
	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.
TAN 20 Planning and the Welsh Language	TAN 20 provides guidance on how the planning system considers the implications of the Welsh language when preparing LDPs and making decisions. The LPA should consider the needs and welfare of the Welsh language, and in so doing, contribute to its well-being. Recent changes

introduced in the current version of TAN 20 are as a result of bringing into
force provisions contained in the Planning (Wales) Act 2015.

The main changes relate to the following matters:

- The link between planning for the Welsh language through land-use planning and community planning;
- Providing clarification that decision makers may take the language into account where it is material to the application;
- Allow language impact assessments in certain specified circumstances.

TAN 23 Economic Development

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.

Paragraph 1.2.1 advises that "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".

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 and imaginatively seek such 'win-win' outcomes, where development contributes to all dimensions of sustainability.

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.

Building Better Places (July 2020)

- 4.4 In July 2020, the Welsh Government issued the document Building Better Places: The Planning System Delivering Resilient and Brighter Futures.
- 4.5 The document emphasises the importance for the consideration of health and well-being throughout the planning system of Wales.
- 4.6 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. The document recognises that tourism and cultural developments may offer a positive way of reusing empty buildings, historic buildings or disused land as part of regeneration schemes. 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

- 4.7 The adopted development plan consists of Conwy Local Development Plan (LDP), which was adopted in 2013. Local planning policy and guidance which are relevant to the proposed development are listed below.
 - DP/1 Sustainable development principle;
 - DP/2 Overarching Strategic approach;
 - DP/3 Design quality and crime reduction;
 - DP/4 Development criteria;
 - DP/5 Infrastructure and development;
 - DP/6 National planning policy and guidance;
 - NTE/1 Natural environment;
 - NTE/3 Biodiversity;
 - NTE/4 Landscape and special landscape areas;
 - NTE/6 Energy efficiency and renewable technologies;
 - NTE/8 Sustainable drainage;
 - NTE/9 Foul water drainage;
 - NTE/10 Water resources;
 - CTH/1 Cultural heritage;
 - CTH/5 The Welsh language;
 - STR/1 Sustainable transport;
 - STR/2 Parking standards;
 - STR/3 Mitigating travel impact;
 - STR/4 Non-motorised travel;
 - TOU/1 Sustainable tourism;
 - TOU/2 Tourism and recreational development; and
 - TOU/4 Chalet, caravan and camping sites.
- 4.8 The Conwy LDP is supplemented by Supplementary Planning Guidance (SPG) documents, some of which are relevant to the consideration of this application, which are listed below:
 - LDP2 Parking standards;

- LDP4 Planning obligations;
- LDP5 Biodiversity;
- LDP6 Welsh language;
- LDP9 Design;
- LDP24 Renewable energy; and
- LDP34 Waste storage and collection in new developments.

5. Main considerations

Principle of development

- PPW indicates a general presumption in favour of sustainable tourism development, particularly in rural areas where it can make a positive contribution to the local economy. PPW states that "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... In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy... Development should be sympathetic in nature and scale to the local environment."
- 5.2 The application site as well as the wider Adventure Parc Snowdonia site is designated as a mixed housing/tourism site within the adopted Conwy LDP.
- 5.3 The Conwy LDP identifies that accommodating sustained economic growth, reducing out-commuting, promoting a more balanced age structure, and encouraging sustainable tourism as some of the priority issues. It acknowledges that the tourism sector has an increase in unemployment over the winter months in Conwy. There is a need to encourage and, where possible, safeguard the tourism sector, particularly in the coastal resorts, and exploit tourism potential, especially relating to the natural and built environment, in order to encourage all-year-round tourism. It also prioritises the promotion of high quality design.
- 5.4 Strategic Policy TOU/1 Sustainable Tourism advises that the Council will promote a sustainable tourism economy by supporting in principle proposals for new high quality all-year-round sustainable tourism development that diversifies the economy and encourages cross-boundary links with neighbouring authorities.
- Policy TOU/2 states that land at the former Dolgarrog Aluminium Works will be safeguarded for the purposes of an all-year round sustainable tourism and recreation facility. The explanatory text identifies that the former Dolgarrog Aluminium Works site is an example of where major facilities may be acceptable in the open countryside.
- 5.6 The former Dolgarrog Aluminium Works site has been developed to provide a major tourism attraction in the Conwy Valley back in 2015 when the site opened as Surf Snowdonia. Since then, additional ancillary developments have been delivered on site,

including the development of Hilton Garden Inn Snowdonia on land to the north of the existing surfing lagoon.

- 5.7 The proposed development in terms of introducing a new wave generation technology to the existing surfing lagoon is considered to be acceptable in principle as it provides a different form of technology, but does not change the existing consented use of the surfing lagoon.
- Adrenaline Indoors building does not seek to change the use of the building from its existing D2 use class. The proposal simply seeks to refurbish the internal space within the building, and would also require alterations and extensions to the building, in particular its roof form and height, in order to accommodate the Snowtunnel attraction internally within the building.
- 5.9 Part 2 of Policy TOU/2 states that new high quality holiday accommodation will only be supported where it forms an ancillary or complementary part of an existing or proposed new tourism development scheme and meets all of criteria a) to j) of part 1 of Policy TOU/2.
- 5.10 Adventure Parc Snowdonia already benefits from planning permission for 36 holiday pods at the site. There is also a hotel on land to the north of the existing surfing lagoon, however, this is run independently from the outdoor leisure complex at Adventure Parc Snowdonia.
- 5.11 The proposed development includes the siting of 21 holiday lodges within part of the existing surfing lagoon which would be filled to provide a plateau. These holiday lodges would form and extension and additional units to the existing consented 36 holiday pods at Adventure Parc Snowdonia. It is therefore considered that the proposed holiday lodges development should be assessed against part 2 of policy TOU/4 'Chalet, caravan and camping sites' of the Conwy LDP.
- 5.12 Part 2 of policy TOU/4 'Chalet, caravan and camping sites' advises that extension or improvements to existing chalet, caravan and camping sites within the Rural Development Strategy Area will only be permitted providing that the development conforms to criteria 2a) to e). An assessment of how the proposed holiday lodge development complies with the relevant criteria is set out below.

- 2.a) The site is within or adjacent to, and would form part of, an existing chalet, caravan and camping site;
- 5.13 The proposed holiday lodges would be sited at two locations; on the western and eastern sides of the existing lagoon. The five lodges on the western side would directly adjoin existing holiday pods. The ones on the eastern side of the lagoon would be separated from an area of existing holiday pods, however they would continue to be located within the existing outdoor leisure complex at Adventure Parc Snowdonia. In light of this, the proposed lodges development would comply with criterion 2.a).
 - b) Any increase in the number of pitches or accommodation units proposed over the Plan Period is small in scale, relative to the scale and extent of existing provision within the same chalet, caravan or camping site;
- 5.14 Adventure Parc Snowdonia benefits from consent for 36 holiday pods as part of the overall leisure complex. The proposal would provide 21 new holiday lodges, which would be sited on land within the extent of the existing surfing lagoon. Of the consented 36 holiday units, 29 would be retained as part of this proposal, therefore resulting in a net increase of 14 units. The number of new holiday lodges would represent a 38.9% increase in terms of the number of holiday units, when considering the overall size and nature of the outdoor leisure attraction at Adventure Parc Snowdonia, the number of units proposed is considered to be proportionate.
- 5.15 The 21 holiday lodges would form an integral part of the scheme, and are critical to the commercial business case.
- 5.16 The application is accompanied by a Business Case which demonstrates the necessity of the 21 holiday lodges to the overall scheme. It identifies that due to the remote nature of Dolgarrog and North Wales, which would be expected to attract 60,000 surfers annually, compared to a similar offer at Bristol that reports 120,000 surfers per annum and Melbourne, Australia reporting 200,000 surfers per annum, due to the proximity of the sites to much larger populations. The business case for the overall development therefore relies on the siting of between 20-22 holiday lodges to generate the investment returns to enable the external funding required to be secured.
 - c) The scheme would not result in an unacceptable concentration of sites or pitches at any one locality or area;

- 5.17 The siting of new holiday lodges at Adventure Parc Snowdonia would be read as part of the overall extent of built development and structures at the application site. There are no other holiday lodges or caravans in close proximity to the site.
- 5.18 The new lodges would be sited within the area of the existing surf lagoon, following engineering works to fill in part of the lagoon. The extent of water and therefore the surf lagoon would be reduced as part of the proposal, however, it would continue to provide a water feature within the site, which assists with blending the overall site into its rural landscape setting.
- 5.19 It is not considered that the proposed siting of 21 new holiday lodges would result in unacceptable concentration of sites or pitches in the locality.
 - d) Suitable access can be achieved and the development does not result in an unacceptable risk to highway safety;
- 5.20 The proposed holiday lodges would utilise an existing vehicular access which serves the Hilton Garden Inn Snowdonia. The application is accompanied by a Transport Note which concludes that the lodges do not lead to an unacceptable impact on the use of the access and therefore highway safety.
 - e) Compliance with criteria 1. b) e) of policy TOU/4.
 - 1. b) Promotes a higher quality holiday accommodation, facility and design;
- 5.21 The proposed holiday lodges would provide high quality accommodation as detailed within the Design and Access Statement. The units would be sited so as to benefit from views over the surfing lagoon, in an area to be soft landscaped to provide a pleasant environment for visitors.
 - c) Would not appear visually obtrusive in the landscape and is accompanied by a detailed landscaping scheme and, where appropriate, a Landscape and Visual Impact Assessment;
- 5.22 The application is accompanied by an LVIA, which concludes that the visual effects of the proposed development will be restricted to a localised geographical area and would not result in substantial harm to landscape character beyond the Site boundary, nor would there be substantial detrimental effects to visual amenity across a wide area.

- 5.23 In terms of effects upon Eyri National Park, there are likely to be some glimpsed views towards the Proposed Development from within a very small part of the National Park, but the proposed development would be maintaining existing and creating more extensive recreational opportunities, which is identified as one of the special qualities of Eryri National Park.
 - d) Accords with the Development Principles and other related policies within the Plan including the joint protocol on flood risk for Towyn and Kinmel Bay;
- 5.24 An assessment of compliance with other policies within the Conwy LDP is provided within the remainder of this Statement.
 - e) Is accompanied by a Biodiversity Statement which indicates where biodiversity gains will be achieved in line with Policy NTE/3.
- 5.25 The application is accompanied by an Ecological Impact Assessment which sets of biodiversity enhancement proposed, as well as a Green Infrastructure Statement.

Landscape and visual impact

- 5.26 The application site lies within Cadw's Registered Lower Conwy Valley Historic Landscape. Policy CTH/2 states that development proposals which affect a heritage asset, including historic landscapes, shall preserve or, where appropriate, enhance that asset.
- 5.27 The site does not fall within but adjoins the Conwy Valley Special Landscape Area in the Conwy LDP, which is a key point of access to Eryri National Park and approach along the Conwy Valley. Policy NTE/4 requires development proposals to show particular regard to the character of each locality, in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape.
- 5.28 The application site lies in close proximity to the Eryri National Park boundary to the west. PPW advises that national parks must be afforded the highest status of protection from inappropriate developments and that the special qualities of national parks should be given weight during the determination of planning applications.
- 5.29 Policy DP/3 requires development to be appropriate to, and enhance, its locality in terms of form, scale, massing, elevation detail and use of materials; to enhance the

local character of buildings, heritage and open spaces, and incorporate landscaping within and around the development appropriate to the scale and impact of the development.

- 5.30 Due to the application site's location in relation to the aforementioned landscape and historic designations, the application is accompanied by an LVIA, which considers the effects of the proposed development on landscape character and visual amenity form the surrounding properties, roads and PRoW networks through from construction to completion. The assessment from viewpoints have been agreed with the LPA prior to the LVIA being completed.
- 5.31 It concludes that the visual effects of the proposed development will be restricted to a localised geographical area and would not result in substantial harm to landscape character beyond the Site boundary, nor would there be substantial detrimental effects to visual amenity across a wide area.
- 5.32 In terms of effects upon Eyri National Park, there are likely to be some glimpsed views towards the Proposed Development from within a very small part of the National Park, but the proposed development would be maintaining existing and creating more extensive recreational opportunities, which is identified as one of the special qualities of Eryri National Park.

Flood risk

- 5.33 NRW's Development Advice Map identify that the vast majority of the application site lies within a C2 flood risk area (blue) as per map in Figure 2.3. The vast majority of the application site is also shown to be within Flood Zone 3 and some in Flood Zone 2 of the more recently updated Flood Maps for Planning by NRW as can be seen in Figure 2.4.
- 5.34 The application is accompanied by a FCA, which has been informed by flood modelling, based on existing land levels and taking into account consented land levels for the surfing lagoon.
- 5.35 The modelling presented as part of the FCA demonstrates that the application site does not lie within a flood risk zone, which seeks to challenge the flood risk zones identified on the DAM and Flood Maps for Planning. Other sources of flooding such as reservoirs and surface water similarly do not pose any significant risk.

5.36 Modelling demonstrates that residual risk, coinciding with the 0.1% + climate change fluvial event, does not case flooding to Adventure Parc Snowdonia, nor the application site, based on the previously consented land levels and embankment level of 6.86 AOD.

Drainage

- 5.37 Policies DP/3, DP/4, NTE/8 and NTE/9 of the Conwy LDP require adequate drainage facilities to serve the development. The proposal is accompanied by a Drainage Strategy which identifies that foul water from the proposed new holiday lodges would connect to the public sewer, as per existing arrangements on the site.
- 5.38 In terms of surface water, this would be incorporated into a sustainable drainage system where surface water from the proposed development would drain into the surf lagoon.
- 5.39 Further details can be found in the Drainage Strategy.

Welsh language and culture

- 5.40 Policy CTH/5 of the Conwy LDP identifies that the Council will ensure that development supports and sustains the long term well-being of the Welsh language, and will resist development which, because of its size, scale or location, will significantly harm the character and linguistic balance of a community.
- 5.41 As the application site forms part of an allocated site for tourism development in the Conwy LDP, the application does not need to be accompanied by a Community and Linguistic Statement/Impact Assessment. However, an overview of how the proposed development at Adventure Parc Snowdonia would seek to support and sustain the long term well-being of the Welsh language is provided below.
- 5.42 The proposed development would provide around 20 full-time jobs and 75 FTE jobs, made up of part-time and seasonal contract jobs. The employment opportunities would offer a range of jobs from Senior Managers, Adventure/surf instructors, food and beverage attendants, maintenance engineers, accounts and reception team.
- 5.43 It is expected that 90% of these jobs roles would be filled by local people who reside within the LL postcode area. This is based on previous employment of staff by Adventure Parc Snowdonia who were committed to employ local people as much as possible. Many of the entry level roles would be expected to be met by local people

who reside in the Conwy Valley area. Employing locally is always the preference for the applicant as local workers take pride in the location and add authenticity to the focus on sense of place as a brand. A local team want to return season after season, which is beneficial for the business as well as the local economy.

- North Wales is a hotspot for outdoor instructors due to the natural topography and this feeds well into the main part of the business's needs; Surfing and Adventure Instructors. Adventure Parc Snowdonia will run Lifeguard and Surf Instructor courses in house at the start of each season to allow for progression from other roles and the same approach would be taken with the snow aspect of the proposals. The applicant would also look to recruit chefs for the food and beverage offer at the site.
- 5.45 The nature of the site means that such roles are attractive and exciting, coupled with competitive rates of pay which are often above average for the adventure instructor roles, as well as the benefits offered such as cycle to work scheme, discounted activities for friends and family, health and well-being programs and opportunities to qualify in internationally recognised qualifications.
- 5.46 Recruitment would be expected to be via use of social media, job fairs on site and in schools, which has been successful for Adventure Parc Snowdonia in the past. This also enables Adventure Parc Snowdonia to target local people in terms of recruitment.
- 5.47 In terms of job roles, Welsh language skills would be desirable and are identified as such on job role advertisements, especially when such job roles include public facing roles. The team are encouraged to communicate in Welsh if they are confident to do so. Adventure Parc Snowdonia previously encouraged the use of laith Gwaith badge in order to show customers and visitors if the team members are confident to communicate in Welsh or if they are learning. In terms of telephone calls, calls are answered in Welsh first, before also greeting in English.
- 5.48 All signage in public areas within the Adventure Parc Snowdonia site would be bilingual, with Welsh first, before English. This reflects the previous approach at Adventure Parc Snowdonia.
- 5.49 The above demonstrate the commitment and support provided towards Welsh language and culture as part of the proposed development, which also applies to the wider Adventure Parc Snowdonia site.

Highways

- 5.50 Policies DP/3, DP/4, STR/1, STR/2 and STR/3 of the Conwy LDP require development to address highway related matters, such as parking, access, and traffic management and mitigation. Policy STR/4 supports non-motorised travel and Policy STR/2 and the associated parking standards SPG outline the parking requirements for various land uses.
- 5.51 The application is accompanied by a Transport Note which sets out the existing provision at the wider Adventure Parc Snowdonia site and confirms that there is a total of 112 car parking spaces including 6 mobility impaired spaces. Overflow car parking is also available to the east of the main car park. The proposed development would provide 14 additional car parking spaces to include 1 mobility impaired space, which are provided from the access serving the hotel, which would serve the guests staying at the 21 holiday lodges. Two of the existing car parking spaces are proposed to be converted to EV charging point spaces.
- 5.52 In terms of traffic impact, the Transport Note concludes that the redevelopment proposals would result in minimal increases in traffic movements on the local highway network when compared to the consented land-use and that these increases will result a minimal impact on the operation of the local highway network. As such, no detailed traffic impact analysis is considered to be necessary.

Biodiversity

- 5.53 Policy NTE/3 of the Conwy LDP relates to biodiversity and advises that new developments should aim to conserve and where possible enhance biodiversity. The policy also requires all proposals to include a Biodiversity Statement detailing the extent of impact on biodiversity.
- The application is accompanied by an Ecological Impact Assessment which confirms that an extended Phase 1/UK Habitat Classification survey and Preliminary Bat Roost Assessment was undertaken in July 2024.
- 5.55 It confirms that the site comprises of a disused lagoon with associated hardstanding, buildings and artificial unvegetated, unsealed surface which is of negligible ecological importance.

- 5.56 All buildings and structures were found to be unsuitable for roosting bats. Off site mature trees to the north and south have the potential to be used for foraging and commuting bats.
- 5.57 The Ecological Impact Assessment makes a recommendation that standard best practice pollution prevention measures to be incorporated into a Construction Environmental Management Plan (CEMP) for the development are deemed sufficient to protect Coed Dolgarrog National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI) located 0.15 km from the site during the construction phase. This is agreeable to the applicant.
- 5.58 All of the habitats to be impacted by the proposals are of negligible ecological importance, and as such, no specific mitigation is required for the loss of these habitats. All offsite trees will be retained as part of the proposals, along with the majority of the grassland to the east of the site. Protection measures are proposed by way of tree protection fencing during construction.
- 5.59 Biodiversity enhancement measures are proposed by way of four bat and four bird boxes are recommended to be incorporated within the scheme, and hedgehog highways are proposed in exterior fences.
- 5.60 Overall, the creation of modified grassland is expected to improve the site overall for biodiversity and deliver a net benefit for biodiversity.

Residential amenity

- 5.61 There are residential dwellings in close proximity to the application site, located on the opposite side of Conwy Road.
- 5.62 The proposed surfing lagoon would be operational between 08:00 and 21:00 during the summer months, and being restricted during winter months to hours of daylight, which reflects the previous use of the surfing lagoon.
- 5.63 Pre-application discussions with the LPA confirmed the need for a future planning application to consider potential effects on residential amenity from the proposed development, including an assessment of potential noise impacts. In light of this, the application is accompanied by a Noise Impact Assessment and an Air Quality Assessment.

- 5.64 The Noise Impact Assessment identifies the residential properties to the west of Conwy Road as the nearest sensitive receptors in terms of any noise break-out from the proposed development.
- 5.65 The Noise Impact Assessment identifies that the new wave generation technology could result in a 'slight' impact on the nearest residential receptors, though it is suggested that the pre-existing nature of the site be considered when judging the potential noise impact.
- 5.66 The proposed effects in terms of noise are not considered to be unacceptable taking into consideration that a surfing lagoon has been operational at the site between 2015 and 2023, and the recreational use of the surfing lagoon would only be during daytime and not at unsociable hours.

6. Green Infrastructure Statement

- Planning Policy Wales (PPW) (Edition 12), 2024 advises that the quality of the built environment should be enhanced by integrating green infrastructure into development 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.
- 6.2 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.
- 6.3 A summary of the green infrastructure baseline is provided below and assessed against the DECCA Framework to establish any impact on the site's green infrastructure using the step-wise approach in PPW.

Table 6.1 assessment of impact of proposed development on green infrastructure

Landscape or ecological designations on site or in close proximity	Location	Proximity to site
Registered Lower Conwy Valley Historic Landscape	Application site lies within	0
Conwy Valley Special Landscape Area	To the south, east north and west	0.15km
Eryri National Park	To the West	0.01km
Eryri Special Area of Conservation	To the west	1.4km
Coed Dolgarrog National Nature Reserve	To the west	0.16km
Coed Dolgarrog Site of Special Scientific Interest (SSSI)	To the west	0.16km
Morfa Uchaf, Dyffryn Conwy SSSI	To the north	0.25km
Ceunant Dulyn SSSI	To the north west	1.4km
Eryri SSSI	To the west	1.4km
Plas Maenan SSSI	To the south-east	1.6km
Mwyngloddiau a Chreigiau Gwydyr SSSI	To the south	2km
Afon Porth-Ilwyd Wildlife Sites	To the north west	0.26km
Ceunant Porth Llwyd Wildlife Sites	To the north west	0.27km
Pont Dolgarrog Marsh Wildlife Sites	To the south east	0.35km
Coed Tal-y-bont Wildlife Sites	To the north west	0.44km
Firs Cottage Wood Wildlife Sites	To the north east	1.1km

Sewage Works Wildlife Sites	To the north	1.2km
Afon Dulyn, Tal-y-Bont Wildlife Sites	To the north	1.3km
Plas Maenan Grassland Wildlife Sites	To the south east	1.4km
Coed-y-Borthol Wildlife Site	To the north east	1.7km
Coed Plas Maenan (N) Wildlife Sites	To the south east	1.7km
Ty-Bach Meadow Wildlife Sites	To the north east	1.8km
Coed Cefn-y-coed Isaf Wildlife Sites	To the north east	1.8km

Existing green infrastructure baseline and condition:

The application is accompanied by an Ecological Impact Assessment which confirms that an extended Phase 1/UK Habitat Classification survey and Preliminary Bat Roost Assessment was undertaken in July 2024.

It confirms that the site comprises of a disused lagoon with associated hardstanding, buildings and artificial unvegetated, unsealed surface which is of negligible ecological importance.

All buildings and structures were found to be unsuitable for roosting bats. Off-site mature trees to the north and south have the potential to be used for foraging and commuting bats.

The DECCA framework	Step-wise Approach set out in PPW			
	Avoid	Minimise	Mitigate	Compensate
Diversity: individual development proposals should avoid negative impacts on biodiversity by considering how biodiversity assets can be maintained and enhanced	due to previ application site	iously constru	icted develo	gical importance opment at the south have the
Extent: Individual development proposals must avoid loss in the extent of biodiversity and incorporate measures to appropriately maintain and enlarge existing habitats, especially where extent is small or declining, through habitat restoration and	potential to be however, the	e used by for proposed deve previously cons	aging and o	commuting bats, uld not result in e of the site so as
creation with adjoining and nearby areas, green infrastructure features and networks Condition: individual development		asures are inco	orporated by	Practice pollution way of a CEMP
proposals must not compromise the condition of ecosystems. Connectivity: Individual development proposals should identify and incorporate measures which enable appropriate links		•	•	prove the overall net biodiversity
to be made between the site and its surroundings so as to improve connectivity	The scheme als	•		boxes in order to
Adaptability to change: individual development proposals should identify impacts to the ecosystem resilience attributes of biodiversity. They should incorporate measures to ensure that biodiversity's ability to adapt to, resist and recover from pressures is enhanced. Enhancement of resilient ecological	Avoid and Mir	nimise.		

networks and securing and enhancing	
green infrastructure will be key ways of	
achieving this, as well as facilitating social	
and economic resilience aspirations of the	
Well-being of Future Generations Act.	

7. Conclusion

- 7.1 The application relates to an application to redevelop the existing surfing lagoon at Adventure Parc Snowdonia with updated wave generation technology to create a new surfing experience, engineering works to infill part of the surfing lagoon together with associated landscaping and siting of 21 lodges. The holiday lodges are considered to be a critical factor to the business case for the proposal.
- 7.2 The proposal also includes the refurbishment and extension to the existing Adrenaline Indoors building at Adventure Parc Snowdonia to house a new leisure attraction by way of 'Snowtunnel' along with all associated site infrastructure and external works.
- 7.3 The application site as well as the wider Adventure Parc Snowdonia site is designated as a mixed housing/tourism site within the adopted Conwy LDP and development of a major tourist facility at the site could be supported by Policy TOU/2 of the Conwy LDP. Therefore, the principle of introducing a new wave generation technology to the existing surfing lagoon is considered to be acceptable in principle as it provides a different form of technology, but does not change the existing consented use of the surfing lagoon.
- 7.4 The introduction of a Snowtunnel leisure tourism attraction within the existing Adrenaline Indoors building does not seek to change the use of the building from its existing D2 use class. The proposal simply seeks to refurbish the internal space within the building, and would also require alterations and extensions to the building, in particular its roof form and height, in order to accommodate the Snowtunnel attraction internally within the building.
- 7.5 The proposed holiday lodge development is assessed against part 2 of policy TOU/4 'Chalet, caravan and camping sites' as an extension to an existing site (by way of the existing holiday pods development. The assessment presented in this Planning Statement demonstrates that the proposed holiday lodges could be supported under policy TOU/4.
- The application site lies within a C2 flood risk area as per the Development Advice Maps, however, the application is accompanied by an FCA and modelling which seeks to challenge the flood risk zones identified on the DAM and Flood Maps for Planning. The FCA and associated modelling demonstrate that the application site does not lie in a flood risk area, based on consented land levels at Adventure Parc Snowdonia. In light of this, it is considered that there is no flood risk reason that would prohibit the siting of holiday lodges within the existing surfing lagoon.

- 7.7 The proposal offers the opportunity to bring life back to the Adventure Parc Snowdonia site, which closed in 2023, supported by an investment of £21M, which would support 20 full time jobs and 75 FTE jobs. It is estimated that 90% of these job roles would be met by local people who reside in the LL postcode. This would provide beneficial effects for the economy locally, as well as support towards the Welsh language and culture.
- 7.8 The application has considered effects on landscape and visual impact, including from Eryri National Park, effects on residential amenity and highways and parking, none of which raise concerns in relation to the proposed development.
- 7.9 In light of this, it is considered that the proposed development can be supported.



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