

Llangors Community Council submission to the Tan Troed pre-application consultation

Introduction

AMS Planning, Architecture and Development Consultants has been commissioned by UKGP Brecon Ltd to undertake a pre-application consultation in respect of the full planning application for a proposed development comprising holiday lodges and associated amenity buildings, replacing the existing outdoor pursuits centre, at Tan Troed, Llangors, LD3 7UF.

The Llangors Community Council has carefully considered all the relevant drawings, reports and supplementary supporting documents made available for inspection and review on the AMS web site. Councillors from the Llangors Community Council also attended the two informal drop-in sessions held in Llangors on the 2nd and 3rd August for residents to find out a bit more about the applicant and the scheme and to ask questions.

General Concerns

The general impression created by these documents and events is that the developer is being driven by financial objectives and has not made serious attempts to establish the impact of the proposed high density scheme on the environment, establish whether it can be sustained by the local infrastructure or to engage with the local community. The evidence for this is the unsatisfactory surveys and studies carried out to date, the reliance on approving authorities to ensure that adequate preparation work is undertaken, the inadequate publicity given to the pre-application consultation in the local area and the belated arrangements made to meet residents and gather local views at drop-sessions.

In the event the drop in sessions were reasonably well attended and provided a good opportunity for concerns to be aired and for the developer to respond. The developer must take due account of all of the resident's concerns and honour all the commitments they made at these sessions introducing appropriate confirmatory statements in the documentation submitted with any full planning application. To reinforce the importance of the information exchanged at these sessions the comprehensive notes prepared by a resident are included as part of this submission as Appendix 1.

A further general point is that the Council believes that the developer should seek a fresh mandate for all aspects of the proposed scheme and not exploit extant legacy permissions granted at a time when concern for their impact on the environment and local communities was far less of a consideration than it is now.

These general concerns apply equally to the Royal Oak Camp site where the same developer is avoiding the level of scrutiny that a full planning application would facilitate and appears to be challenging the boundaries of acceptable design of accommodation in what they should recognise is an extremely sensitive location for wildlife.

Detailed Concerns

The following part of the submission to the pre application consultation comments on the documentation made available for review and does not take account of any clarification, further information or commitments made verbally by UKGP Brecon Ltd representatives at the drop-in sessions.

Llangors village and the immediate local area is already a popular holiday destination with two caravan sites situated close to the lake that are both open between April and October and numerous holiday lettings. Consequently residents and the Community Council will understand what holiday makers bring to the area in terms of benefits and what are tolerable adverse implications.

Occupancy

The Planning Statement helpfully draws attention to the Brecon Beacons National Park planning policy 46 – Non Permanent Holiday Accommodation – that includes the requirement that:-

c) the development will not be occupied as permanent residential accommodation and will be subject to a seasonal occupancy condition restricting the use of the site to certain periods throughout the year;

In response the Planning Statement advises simply that *The development is expected to be controlled by a holiday occupancy restriction (c).*

This unhelpful prediction must be replaced with a clear unequivocal statement of what occupancy restrictions will apply to the development and a clear explanation of how this will be compliant with BBNPA 46(c). This statement must also confirm whether the lodges will be for rent only and how the occupancy restrictions will be enforced should the lodges be sold off to a third party either singly or as a whole site.

There is also a paucity of information about site provisions that will condition holiday maker's behaviour and the consequent potential impact on local residents. For example more information must be provided about restrictions that will apply to prevent loud music from late night parties and stag nights either in the restaurant or in the lodges. More clarity is also needed on the provision for car parking spaces beyond the inadequate one per lodge plus five mentioned in the Transport Statement and the number of EV charging stations which are not mentioned at all.

Drainage and related services

The Drainage Strategy states that the site itself has a low risk of flooding but it fails to recognise the flooding events that have occurred in the village in storm conditions caused by excessive run off from the general area of the site. These events have been the flooding of B4560 due to overflow from the watercourse identified as in the Drainage Strategy as suitable to accept surface water from the site and flooding of several of village properties due to substantial water flows down the unclassified road that passes the site to the north.

The drainage strategy states that the site currently has *a private combined drainage network serving the existing buildings which connects to the DCWW foul water sewer*. This statement implies but is not categorical that the site currently discharges all of its foul water and collected surface water into the local sewage system.

The proposal to separate the foul and surface water systems is welcomed. However, the proposed new foul system is caveated that *Any connection to the public sewer will be subject to a capacity check and approval by DCWW prior to construction.*

Whether or not the proposed development will overwhelm this existing village sewage system must be established before planning approval is sought and the proposed site system must take due account of the available capacity and not simply assume that it will be adequate.

Local foul waste holding tanks are notorious for causing a bad smell nuisance in the local area when the irregular pumping out into the permanent sewage system takes place. To protect the local village the system must be fitted with an automatic aroma suppression system.

The Drainage Strategy states that *it is proposed to discharge the surface water runoff from the development to an unnamed watercourse/ditch within the vicinity of the southern site boundary. The outfall will cross third-party land and so consent from the landowner will be required.*

An assessment is need of the impact of these discharges on known flooding risk to the B4560 and to the village particularly during periods of sustained bad weather when the proposed fixed capacity site surface water retention features are likely to be overwhelmed.

The documentation is silent on water consumption and on the capacity of the local water supply system to meet the expected site demand. A clear statement must be provided to explain how the sites water consumption will be provided and include a confirmation that supplies to residents will not be adversely impacted.

Electrical Power and related services

The consultation documentation is silent on electrical power consumption and the adequacy of the current site connections to the local network.

A clear statement must be provided to explain how the sites electrical power will be provided and include a confirmation that supplies to residents will not be adversely impacted.

The consultation documentation is also silent on site lighting which is a major shortfall given the the site is located in the Brecon Beacons Dark Sky Reserve.

A clear statement must be provided to identify and specify all the permanently installed site lighting explaining how it impact on the local dark sky and how light emitting from the lodges will also be restrained.

The consultation documentation is silent on broadband connections and capacity and also mobile phone signal strength and capacity.

A clear statement must be provided to identify how the sites requirements for broadband and mobile phones will be provided without adversely impacting residents' current levels of service.

Transport

Local residents who use the single track roads in this area know that the unclassified road that provides access to the site is unsuitable for the size and density of the proposed scheme. Likewise the Highway Authority (HA) have significant concerns over the unsustainability of the site.

The Transport Statement relies heavily of the measurement of traffic patterns carried out between the 29th March and 4th April this year. This out of season survey took no account of holiday traffic, farm traffic and failed to identify numerous dog walkers and the regular use by strings of horses trekking up to the common land beyond the site and returning. Currently because of the current low traffic flows this road is a safe and convenient environment for these other local users and the Transport Statement is remiss in not taking them into account.

The Transport Statement's out of season survey has led to a number of incredible conclusions such as that *the potential occurrence of two cars having to pass each other on the narrow sections of road to the north of the site will therefore be limited*. This is compounded by the assertion there is *there will be plenty of time and space on the highway for vehicles to manoeuvre into appropriate locations on the road to allow two vehicle can pass each other*. There are no such spaces.

Much emphasis is placed on the need to encourage holiday makers to walk from the site to the village which is essential as there is insufficient parking for those wishing to use the local amenities. The unclassified road is the only available route for walkers but the lack of a walkway or even safe refuges will at best be off putting and with the increased traffic level pose safety concerns particularly after dark.

The Transport Statements must be completely reconsidered using realistic traffic assessments and include proposals that mitigate the obvious unsustainable nature of the existing roadway.

All traffic from the site to the lake, to the nearest major shopping centre and to almost all of the major attractions in the National Park will pass through the centre of Llangors village. Due to the lack of off street parking much of the road through the village is effectively single track particularly during evenings and at weekends.

Where the B4560 passes through Llangors village must also be the subject of a full traffic survey and impact assessment.

Ecology

Much of the work that underpins the Ecological Appraisal has been desk studies whereas of recognised higher value is a search for signs of protected species and assessment of the potential of habitats and features to support protected and notable specie. In this respect the Ecological Appraisal admits that the *timing of the survey was sub-optimal to detect field signs of many protected species and plants associated with some habitats may not be visible during mid-March*. Consequently a number of further surveys are recommended in order to provide a credible assessment.

The further studies recommended by the Ecological Appraisal must be completed and reported before submission of a full planning application in order to allow a comprehensive assessment of the impact of the proposed scheme on the local ecology.

As the site is located in a Wye Valley Catchment Area the discharge of Phosphates is of major concern. It's not clearly apparent that this issue has been assessed fully as no clear remedial action is identified.

Appendix 1

Tan Troed and Llangors Lake Development Proposals Q&As from Community Meetings 2nd and 3rd August 2023

Summary of proposal as described by the company in the two meetings

Green Parks Ltd is a holiday park company led by Mark Gentle and Ben Nolan-Stone, who attended the meetings in the community on 2nd and 3rd August. Mark and Ben worked together in a company called Aria Resorts for several years, setting up holiday parks of different descriptions. They formed Green Parks Ltd in December 2022. As Green Parks, they have set up another park of a similar design to the one proposed for Tan Troed. The park is in Bude, Cornwall. Information about it can be viewed here:

<https://www.whalesborough.co.uk/>

Proposed for Llangors at Tan Troed is a site of 49 modular self-contained lodges. 41 will be pod-shaped structures, 12 x 1-bed and 29 x 2-3 bed; and a further 8 will be 2-bed L-shaped structures. 1-bed lodges will accommodate 2 people, 2-beds 4 people and 3-beds 6 people.

Proposed for the Royal Oak site at Llangors Lake is a small development of 15 lodges of 1-2 beds each, and the refurbishment of the restaurant.

The company proposes 12-month, 365-day site occupancy. They don't anticipate ever being at 100% occupancy. They anticipate peak occupancy of 88% at the height of summer, reducing to 35% occupancy in what they term the shoulder months. In numbers of people this translates to 127 people at peak occupancy of 88%; 144 if 100% occupancy was reached.

The maximum length of stay for all customers is three weeks.

Current hard services will be removed. All roads and pathways within the development will be porous soft surfaces.

All current buildings will be removed.

Lodges will be timber framed, secured by ground screws rather than by the building of foundations. All ground cover will be green. All roofs will be garden roofs and these and a rain garden in the centre of the site will be part of a system to manage rainwater.

The wide band of grassland encircling the site will remain as flowering grassland, with a biannual mowing regime to encourage natural flower growth. This combined with the green surface cover of roads and roofs is designed to minimise the visual impact on the landscape when viewed from higher ground.

The pre-planning consultation process as a means by which the community can submit suggestions as to how the proposal might be developed to accommodate the community's needs. The company undertakes to listen to the community's concerns and to explore means by which to mitigate for them. The company undertakes to examine every suggestion and to accommodate all that are practical and commercially viable for the company.

The company committed at the meeting on 3rd August to instruct its planning consultancy to extend the deadline for the pre-planning consultation.

Updates since the meetings on 2nd and 3rd August:

- The pre-planning consultation deadline has been extended to 17th August 2023.
- A topographic survey of the lane will be undertaken to explore potential passing places.
- Licenses for further traffic surveys will be obtained from Powys County Council and will be undertaken in September (obtained during school holidays are not accepted by the highways service).
- A hydraulic modelling assessment of the existing water supply will be scoped with Dwr Cymru Welsh Water.

Questions, Concerns and Answers (2nd & 3rd August, collated and edited)

ABOUT THE COMPANY

Question: *Are you UK Green Parks or UK Country Parks?*

Answer: We are UK Green Parks; it's a new company, established in December 2022. We've set up Whalesborough, a similar development to the one we're proposing for Llangors, on a large farm estate in Cornwall.

We work with a management partner called London Green Parks UK, and they didn't want our brand name to be so similar to theirs; so we use 'UK Country Parks' in our branding.

Before we set up UKGP, we (Mark Gentle and Ben Nolan-Stone) worked together in a company called Aria Resorts, which grew to 14 resorts before it was taken over by another company. We both have a lot of experience in this field, gained with Aria Resorts.

TRANSPORT & VEHICLES

Concern: *Increased traffic on the village roads and in particular the narrow C0103*

Answer: We will implement measures to mitigate the impact of increased traffic, including:

- Encouraging customers to bring no more than two cars per lodge
- Staggered check-in days and times of day
- Staggered blocks of stay to avoid traffic pinch points on Fridays and Sundays
- The provision of an electric shuttle bus to transport customers in groups to local amenities such as the shop and pubs, to limit car-use for local journeys by customers
- Encouraging customers, in publicity and in on-site welcome packs, to walk or cycle to local amenities

Question: *Six people staying in a 3-bed lodge could arrive in 6 separate cars; can you limit car numbers?*

Answer: No, but we advise a 2-car limit per lodge.

Our experience with other sites shows us that customers disregarding this will be rare.

We calculate that at peak occupancy of 88% and 127 people, there will be c. 86 cars on site, including staff.

Question: *Will you provide parking for boats?*

Answer: No. But if, following this consultation, everyone thinks we should provide boat parking, we'll do that.

Question: *Do your other parks have the same kind of access roads as this site?*

Answer: Some of them are on main roads, but others are on small roads, like this. In those parks, the measures we're proposing have been successful - staggered arrivals and durations, traffic-calming, etc.

Concern: *The traffic survey conducted by the company was in a season (March-April) and at a time of day insufficient to provide accurate data about traffic at peak times*

Answer: We did the survey according to advice we had received. We have reviewed that and will extend the survey to collect more traffic data at a different time of the year. We will have to work with the Highways department to mitigate traffic.

Concern: *There is already traffic on the CO103 - agricultural traffic, horses, walkers. The extra traffic from your development, especially through the narrow section of the lane, is going to cause you and those residents problems. We've coped for decades with PGL, Acorn and two caravan parks; but the traffic with this proposal is going to cause real problems*

Answer: We're open to discussions with you about traffic management. The Highways department will also advise and regulate us.

We think our mitigation measures will be effective.

The usage that is permitted by the current permissions has the potential for more traffic than our proposal does.

At its height of business, there were 50-60 cars at PGL at any given time.

Question: *The letter from Highways in your re-planning documents expresses concern about the narrowness of the road*

Answer: We will open dialogue about that with the Highways service and consultees.

Concern: *The impact of increased traffic on horse-riders; residents who ride horses and the riders with the two trekking centres, all of whom use the CO103*

Answer: We can't stop people driving but the nature of this type of development is lower-density occupancy and shorter breaks, which will mitigate against a lot of cars on the road at the same time from the site.

We will encourage customers to walk and cycle.

Question: *What if that doesn't work and they drive to the village?*

Answer: We'll talk to the transport department during the planning process about the potential for traffic-calming measures.

We will put on an electric shuttle bus and encourage customers to use it for local trips.

Question: *Who are the specific types likely to walk to the village and back?*

Answer: Our accommodation is 5 stars and our target market is people who walk, hike, ride horses; in high season, families; and in the shoulder months, outdoors types. Our holiday parks are the quieter type of park, not full of entertainments. There won't be enough on-site entertainment to attract people and families who want to be entertained.

Question: *Most people who come to the country don't walk further than 50 metres from their cars; if they get into their cars, they're unlikely to stop in the village. Cars will be going in and out of the site all day.*

Answer: We will look at that in detail, with you and with the Highways department. We will encourage people to stay local and to walk, and we'll provide an electric shuttle bus for trips to the village and the local community.

Question: *Will the company fund road improvement works?*

Answer: This question will arise in the planning process and the discussions with the regulators. The company is open to all suggestions that are practical and commercially viable.

Concern: *You're talking about highway infrastructure improvements - I don't want a pavement on the lane. And Powys county council won't pay for anything; they don't have any money*

Answer: We wouldn't ask the council to pay for the road improvements.

Concern: *That on-site parking might either encourage customers to bring several cars per lodge or cause overspill parking in the community*

Answer: There will be parking space on site for two vehicles per lodge, with overflow parking for additional vehicles, but all customers will be encouraged to arrive in no more than two cars per lodge.

Our previous experience and data suggest that on a site of this nature, it is rare for customers to arrive in more than two cars per lodge. We will check our calculations in this regard.

Our original intention was to have two parking spaces at each lodge but Bannau Brycheiniog National Park advised in pre-planning discussions that parking should be in localised on-site cluster car parks of multiple spaces rather than at lodges.

Question: *Will there be on-site electric vehicle charging points?*

Answer: Yes. These will also be available to the local community.

WATER SYSTEMS, DRAINAGE & SEWAGE

Concern: *The impact of additional foul water on the local sewage system*

Answer: The planning process will assess the site's capacity for foul water collection, storage and management. The company will be required to comply with regulatory conditions in this regard.

We have contracted a civil engineering company, Bear Structures Ltd, based in Cardiff, to develop an effective water, sewage and drainage strategy.

A phosphates management and network redesign process is ongoing and all concerns will be taken into account.

Foul water will be separated from fresh water and contained in a holding tank. We will work with Welsh Water during the planning process to develop a system that limits impact on the local sewage system. If the site system develops issues, we will tanker foul water out of the site.

We believe that the site at full capacity will produce less foul water than the number of visitors the site's current planning permission (for activities for up to 200 people) would produce at capacity. We believe that the density of people on site will usually be less than when PGL was operating there.

The planning process will demonstrate the potential impact. The community will be kept informed throughout.

Concern: *The village is already prone to flooding; this development will exacerbate the problem*

Answer: We are aware of the flooding issues and our construction consultants have designed the water management system with awareness of the flood data. We are

confident that the measures we will take to manage water on site will prevent additional flooding. Measures include:

- Rain gardens will filter water through vegetation, collect and moderate the release of rain water
- A controlled release system will be set to a specific peak volume discharge which will limit the volume of water released into the environment at any given time

Question: *Where will the water for site amenities come from?*

Answer: We haven't reached that stage of technical detail yet; this will be worked out during the planning process. Our technical consultants will work through that detail. The system will be regulated to reduce impact on the local system. But when the site was operational under PGL and Acorn Adventure it had permissions for 200 people using the water system.

Question: *Will you have a sprinkler system? Will you construct a bore-hole?*

Answer: The buildings conform to The Caravan Act in terms of fire risk mitigation. There will be fire extinguishers, but a sprinkler system has not been required yet. If we are required by the planning authority to install one, we will.

The potential for a bore-hole is being surveyed; if we can do it, we will.

Question: *I'm concerned about the potential health problems if you run short of water. Can you guarantee that you will have a constant clear water supply, that you won't underestimate your needs?*

Answer: We've contracted a civil engineering company, Bear Structures Ltd, and a green energy specialist. We will also work with other consultants and Welsh Water. We're using our learning from other parks we've set up.

We'll design the system, with our specialist contractors, and consult Welsh Water. If the system doesn't give us the capacity we need we'll adjust it. If the finished system doesn't work properly, we will expect the designers to put it right.

Question: *There is a limit to the village's capacity. Our water is pumped from Talybont reservoir. Sometimes we're without water. If you're adding up to 144 people it will add to the demands on the village supply.*

Who will pay for the extra capacity?

What are Welsh Water's views?

Our fields are often wet throughout the year; how will they absorb the additional water from the site?

Answer: Bear Structures Ltd has designed the system, with knowledge of the SuDS Approval Body application. We can share the SAB application with the community.

Bear have designed the water management system to work for a hundred year store. The system has been designed with awareness of local flooding issues.

Additional information provided in writing by the company since the meetings:

‘The current development on site has both foul and surface water draining to the public sewer. In contrast, the new scheme would not drain surface water to the public sewer, instead using a bespoke designed SuDS system including rain gardens, an attenuation pond, storage crates etc. For this reason also there will be no additional phosphates reaching existing waterbodies given the new SuDS measures which will be put in place.

‘Re. the flooding question, it would be helpful to clarify that any existing potential for the site to flood from surface water will be far improved through the removal of existing hard standing and SuDS installation.’

ENVIRONMENT

Concern: *The potential environmental impact.*

Answer: Our development is designed to be sympathetic to nature, and built on the ethos that if we left the site following development, the site would revert to its natural state within one year.

Question: *The information you shared states that a number of further environmental impact surveys are required. Have these been done?*

Answer: These haven't been done yet, they will be completed during the course of the planning application process, at the appropriate stages of the process; we will be instructed by the planning authorities' ecologists to conduct each survey as and when it's required and we will comply. The regulations require us to conduct the surveys at the appropriate times in ecological terms. If we apply for planning permission at a time that is outside the season during which a bat survey can be conducted, a condition will be placed on the planning and we'll be required to comply with that condition before we begin work on the development.

Concern: *The impact on nocturnal biodiversity and compliance with Dark Skies regulations*

Answer: Lighting at the site will comply with the Dark Skies regulations. We work to Dark Skies regulations at the Whalesborough site in Bude, Cornwall, which also has Dark Skies status. Compliance will be assured through the planning process.

Each light on site is an inverted slot light sufficient to permit customers to find their way in the dark but not sufficient to cause light pollution. Lights are all time-controlled and will be off from a certain hour of night, all night.

Electricity will be provided by a solar farm operated by us at Whalesborough and exported here. We anticipate installing a wind turbine at Whalesborough in the near future.

Question: *Does the development at the Lake have the same environmental ethos? What about the glass roofs?*

Answer: We're removing the proposal for glass roofs now, following feedback. We have to comply with the recommended lux levels. We've submitted revised plans to NRW.

Concern: *The Lake is quiet in the winter, which is good for wildlife. But there is people pressure on the wildlife there all year round; and the lake is flooding more and more often*

[Note from Sian: the questioner raised this concern then followed it with questions about other issues and the developers answered the questions but missed this concern. Their answers to the questions are listed elsewhere in this document. I sought a response to this concern from the company and have added it to the end of this document.]

LOCAL COMMUNITY

Concern: *The impact of customer behaviour on the tranquillity of the village, particularly the environment around the site. Noise in the evenings from on-site*

activity, such as the children's playpark and the customers' socialising at the bar and outside their pods. With PGL and Acorn, the young people went to bed at a certain time. Adults at a holiday park will make noise all night

Answer: Our resorts have rules. No noise after 10pm. There will be a warden on-site 24/7 to ensure compliance.

The target customer is the outdoor type, looking to connect with nature or take part in outdoor activities such as hiking, cycling and horse-riding, not people who want on-site entertainment.

The bar and restaurant are very small. The restaurant will have 15 covers inside and 10 outside. They'll have sporadic opening times and will close by about 9.30 or 10pm. Food and Entertainment will be regulated by licensing, usually set at 10-10.30pm, but we want to be good neighbours.

Barbecues are prohibited.

Music will be prohibited beyond a certain time in the evening.

We'll encourage people to come into the village for evening leisure and entertainment.

Children's activities will be things like bug hotels.

We can relocate the playpark, this is an example of why we're doing this pre-planning consultation; to hear your suggestions and adapt the proposals to try to make them work for you.

Concern: *The potential visual impact on Eligro lane.*

Answer: We'll enhance the boundaries of the site, including all along Eligro lane. The grassed area will be a flowering lawn; we'll plant additional tree and hedgerow cover.

Question: *Eligro lane won't be affected?*

Answer: No.

Question: *Will you educate people about wildfires, and country practices?*

Answer: Yes.

No fires are permitted on site. We'll educate guests about outside fire risks.

We'll take information about country practices from you, and educate our guests about those things.

Question: *Have you consulted local businesses about your restaurant?*

Answer: We're doing that as part of this pre-planning consultation.

Concern: *The potential impact of on-site activities on local businesses and services.*

Answer: We will encourage customers to use local services and businesses such as restaurants, bars, shops, cycle-hire companies, trekking centres, etc.

The proposal includes onsite a small shop providing very basic supplies, a small restaurant and bar. These are there principally to serve customers who arrive late or return from local activities tired and not wanting at that time to go out again into the community. Having this provides a better experience for our guests.

We will supply the on-site welcome packs from the village shop, and the on-site shop from local shops.

Question: *Are dogs permitted?*

Answer: Yes. We will have a limited number of pet-friendly lodges, and a designated dog-walking area in the amenity space. [Note from Sian: the 'amenity space' is the grassed area around the boundary, which under the proposals will be a flowering lawn.]

Question: *Have you consulted local landowners about the increased number of people and dog-walkers and how they will be impacted?*

Answer: Not directly but we can do that as part of the planning process.

Question: *Have you assessed the ripple-effects of a similar site in a similar location elsewhere on the local community, for example on house prices? I'd like to learn more about the experience of people in similar places.*

Answer: We can provide some of that information. Our Whalesborough site in Cornwall and our site in St Helen's on the Isle of Wight are similar sites socio-demographically. At Whalesborough we're fully engaged with the parish. The development will bring £10.5 million in tourist spend into Bude and reduce unemployment by 33%.

Question: *To what extent will you partner with local businesses throughout, in the construction phase, the ongoing management and maintenance of the site and the delivery of amenities?*

Answer: We want to use a local construction company with an environmentally-friendly ethos. The works will go out to tender and we would prefer to contract locally, to reduce the environmental impact of the construction period and to put money into the local community.

In our other projects, maintenance contracts and service level agreements have usually been with firms within a 30-mile radius of each site. We benchmark local prices against prices elsewhere and try to use local for all aspects.

We aim to purchase products as locally as possible. We will look to supply our shop from the village shop and other shops locally.

We aim for the produce in the restaurant to be procured within a 25-mile radius.

We will outsource all on-site activities as far as possible, always using local activity companies and equipment companies where possible.

We're talking to local suppliers as part of this pre-planning consultation.

Question: *Realistically, there aren't enough contractors locally to build for our needs. You will need to use outside contractors*

Answer: There are things we should be able to achieve locally, within a certain radius.

Question: *What will the impact of the construction phase be on the community?*

Answer: We will use a Construction Management Plan to identify in the development review process potential negative impacts of the construction phase, and mitigate for them. We will build between 9am and 5pm. There might be some activity on Saturday mornings, but we'll negotiate that with residents. There will be no work on Sundays.

It's not a big site. It won't require high numbers of large lorries. We'll remove the existing hard surfaces and crush them on site, at a considerate time of day.

As the time for detailed planning approaches we'll update the community.

Question: *How many jobs will the development create?*

Answer: There will be 15-20 jobs across both sites, of which 8 will be permanent, full-time roles. At the outset other roles will be part-time, but we intend to scale more up to full-time.

We aim to recruit locally.

Question: *Will there be live-in management?*

Answer: No. There will be 24-hour on-site warden and security guard, and a 24-hour on-call helpline. Villagers can have that number and use it to alert us to any issues that arise.

Question: *Will amenities be open to the community?*

Answer: Yes, at all times.

Amenities on site proposed so far are the small bar and restaurant, low-level activities and a play area on the amenity space [grass border area].

We will provide the community with a discount card of 10-15% to use for on-site amenities.

The car park at the entrance to the site will be open for local people to use.

We're open to suggestions from the community for further activities or amenities.

Question: *Is there a possibility of tennis courts and playing fields at the site, accessible to local children and young people?*

Answer: We are open to having a separate meeting with you to discuss that; to explore what the community would like us to do.

We could perhaps use a poll to identify the 4-5 things that the community wants most.

Question: *Do you plan to support local community groups?*

Answer: Yes, that's part of our ethos and we're open to that. We will be 100% behind local projects.

Question: *Are you and your customers aware of local farming practices, such as the spreading of untreated slurry on fields and the intensive spraying of insecticides and herbicides; and the growing of crops such as oil seed rape, which triggers hay-fever. There is no room to pass slurry and silage lorries in the lanes and they go by up to 10pm.*

Answer: Our site in Cornwall is a working farm; guests know all about that stuff, and love it.

Question: *What does your development offer of benefit to the community?*

Answer: Jobs; spend into the local community; support for local projects. This will be a community asset. We think it will benefit the local community more than the site's previous usage did.

Additional information provided by the company since the meetings:

'Re. the Bude figures, it would be helpful to clarify that these are based on the applicant's understanding and that the proposed development will aim to bring £10.5million of tourist spend to the local area. These figures would be firmed up through an economic impact assessment.'

OCCUPANCY

Question: *BBNPA regulations stipulate that holiday sites comply with an occupancy restriction which prevents 12-month occupancy*

Answer: No. Downtime periods are optional under the regulations. Some sites are restricted by their planning permissions to fewer than 12 months of occupancy but others are not. We have permission for 12 months' occupancy.

Question: *Are you permitted to facilitate residency?*

Answer: No. Our bookings are limited to 3 weeks maximum under our planning application. Residency would require a different planning process.

We have no intention of applying for residency permissions.

Question: *You guarantee no residency?*

Answer: Yes. We guarantee it.

Question: *Are your lodges for sale?*

Answer: No.

Question: *Will you accept large bookings?*

Answer: No. Our Terms and Conditions stipulate no large bookings. If customers attempt to bypass that rule, we ask them to leave and refund them.

Question: *Is your proposal the same in terms of numbers as the site's existing use?*

Answer: No, ours is a reduction in numbers compared to the current permissions. It's a completely new usage planning application.

Question: *Have you considered the possibility of the site becoming used for Government-sponsored immigrants?*

Answer: No. The proposed usage is for holiday stays only.

SITE INFRASTRUCTURE, SIZE & LANDSCAPING

Question: *How will your electricity be supplied and what will the impact be on the village supply?*

Answer: We have a solar farm at our site in Cornwall. We will export from there to the grid all of the electricity we will use at the Llangors sites; we calculate this will be

2.2 megawatts. There is 200 kilowatts of power at the site currently. We'll upgrade and increase the supply. We'll pay for off-site enforcement.

Question: *How can you offer EV charging? I wanted two charging points at home and was permitted only one, because of capacity constraints on the supply locally*

Answer: We're building a private high-voltage network on site at Tan Troed. Our electricity use won't affect the village supply at all. We aim to provide charging unit supply to all of the cluster car parks within the site and to the public car park at the site entrance.

Question: *Will your development affect my WiFi?*

Answer: We'll be requesting a new fibre line. We want to supply 10-15 megabytes to each pod. If we can't get local bandwidth we'd bring it in by satellite. If we can get better signal with satellite, we'll look at helping the village.

BT will treat our supply separately. If there's no capacity, we won't be allowed to have WiFi.

Question: *What's the commitment to sustainability and renewables on site?*

Answer: We want to have a small solar array on site; so far there's pushback against this from the county council. We'd love to have wind power on site, too. We're aiming to be a carbon-neutral business in Cornwall by May 2024. We'd love to do that in Llangors too.

Question: *How are the pods constructed?*

Answer: The 1-bed units will be brought in nearly complete by lorry, outside of peak traffic times. The 2-bed units will be brought in in two pieces.

Question: *What is the longevity of a pod?*

Answer: When the lifetime maintenance programme is adhered to, the simple pods have a lifespan of 99 years and the L-shaped pods are certified for 95 years.

Question: *Are the pods self-catering?*

Answer: Yes, all of them.

Question: *Why don't you start with something smaller? Pods are crammed together; there seems to be no privacy, no space.*

Answer: This is a standard layout. There will be planting between the lodges and around the site to enhance privacy.

Question: *Will you consider reducing the number of lodges?*

Answer: So far this is our baseline. As we go through the planning process, if we're advised that the density is too much, we'll look at it. We've tried to do a ground-up process, of minimal impact.

The development has to be commercially viable for us. This is the size we've calculated it needs to be for that.

We already have planning permission for this scale.

Question: *Please tell us about the existing planning permissions*

Answer: The existing permission provides for accommodation for up to 200 people (adults and children) plus staff year-round; and for a range of outdoor activities year-round - these could include archery, quad-bikes, go-karts.

That is a commercially viable model for us but it's not our business model.

We want to do the right thing. We could have put tourers and camping in this year but we didn't; we sat on it this year in order to develop this proposal.

Question: *Your proposed development as it is leaves half of the site empty. Are there plans for expansion?*

Answer: No. The amenities space [the band of grassland] is important from a visual impact perspective. We would be very unlikely to leach into that space and we have no plans to do that. The infrastructure will serve a maximum of 49 pods; there will be no extra infrastructure.

Question: *But there's nothing to stop you applying for permission to do that?*

Answer: No

Question: *Are you applying for permission to build any permanent accommodation?*

Answer: No, none.

Question: *Will you provide dog-poo bins?*

Answer: Yes, bins and maintenance staff, and a designated dog-walking area,

Question: *Will you provide extra bins around the village?*

Answer: Yes

Question: *Tell us about the development at the Lake*

Answer: There will be 15 units. 10 units will be ordinary pods, and five will be geodomes.

We'll refurbish the restaurant. Our proposal for that development will also be year-round.

The 15 pods already there already have permission, obtained by Acorn Adventure. We'll be removing those pods.

Question: *What will you do with the third piece of land by the Lake?*

Answer: We have no plans for the land and no permissions to develop it. We're not incorporating it into our business plan. We're working with another organisation to maintain it to support wildlife and to keep it habitat-rich.

Question: *Will you sell it on?*

Answer: No; we'll keep it as land value. If the community wants to use it we're open to discussion about that.

Question: *If so, could we improve access?*

Answer: The access land is Deri Morgan's; that would be his call.

Additional information provided by the company since the meetings:

'Re. the first electricity supply question, it would be helpful to clarify that the figures given are based on the applicant's intentions, subject to planning.

'Re. references to wind and solar, it would be helpful to clarify that the applicant would be interested in exploring options to include these in the future subject to planning and the views of the community.'

PLANNING PROCESS

Question: *When are you hoping to have everything in place?*

Answer: The planning application will be a 13-week process. If we get planning permission, we'd look to start 6-8 weeks after that. The development phase is 22-36 weeks, depending on manufacturing slots. The core groundworks will take 16-20 weeks.

We're aware that the planning authority is understaffed and this might cause delay.

If the village supports the application and the process runs smoothly, we hope to open in either the Easter, Summer or October half term holidays in 2024.

Question: *Will there be a repeat of this meeting later in the process?*

Answer: Yes. Sian will provide you all with my contact details.

Concern: *These mitigation measures should have been put in your formal proposal*

Answer: This pre-planning process is to obtain information about the community's concerns, your views and suggestions, so that we can accommodate them where possible and amend our proposal accordingly, before we submit the planning application, before we create the full detail.

These meetings won't be the only meetings. We'll continue to communicate and meet with you and you can continue to make suggestions and recommendations, which we'll continue to accommodate where practical and economically viable for us.

Question: *We need the extended traffic survey done before the planning application is submitted. The consultation is on the documents submitted in the application, not on the actions you take afterwards*

Answer: We've done as many surveys and assessments as we were required to do for the next stage of the planning process. We're doing over and above what the formal requirements are.

Concern: *I feel that the formal planning process is our only opportunity to influence what happens; you're batting our questions away with 'it will depend on this or that'.*

Answer: Some of the technical pieces haven't been designed yet, at this stage. As it goes through the process we will be better able to answer your specific questions. This pre-planning consultation is to obtain your views and feedback. We're showing you our proposal. We'll take all your comments on board. We'll set up future meetings to explore how we can accommodate people's wishes.

Question: *How does our consultation influence the process?*

Answer: We'll take on board the concerns and suggestions. We'll create a document setting them out and our response.

Question: *Why didn't you meet us before buying the land?*

Answer: The matter was commercially confidential at that stage.

Question: *If BBNPA say that you have to scale it down, you'll have to scale everything else down?*

Answer: Yes. The planning process will include ecological impact assessments, traffic assessments, other assessments; we will go through all of these areas with the regulatory authorities. If they say the development is too dense, we have to tweak it.

Question: *What if the community says it's too dense?*

Answer: We take that on board. We have to have a baseline proposal; this is it. But we can look at making changes to it.

Question: *Will you extend the deadline date for the pre-planning consultation?*

Answer: I [MG] will commit to saying the 10th August is not a drop date; I will extend it.

We'll discuss this with the planning team. We're happy to keep it open if we can; it is sensible to work with you some more.

Question: *Will you meet us again once you have more detail firmed up?*

Answer: Yes. We will see how long we can extend the deadline to, then look at more community meetings, as well as independent meetings for those who would be more comfortable with that.

Question: *You're promising a lot of things. If you fall short of budget, what will happen to your promises?*

Answer [MG]: If I cut corners I will be punished. We have funding specifications that we have to meet. We have to do everything we say we'll do, regardless of the cost. Building control authorities will be coming in to monitor us.

I can commit to a monthly or quarterly development update for the village.

We can hold open days for the village.

Question: *What will you do if the development doesn't make the money you need it to?*

Answer: We have multiple resorts. If they're not performing as we want them to we try to evolve what's on offer on site. We have no intention of selling the lodges.

Question: *Other holiday parks have grown much bigger than the sizes they started with. This site growing bigger would be out of alignment with the evolution of the village*

Answer: We've had pre-application meetings with Bannau Brycheiniog National Park, at which we've been guided to keep the development within the current parameters.

Question: *If planning permission is denied, what will you do?*

Answer: We will develop the site according to the planning permission it already has, for camping, outdoor activities and team-building programmes for up to 200 people. The company owns the site at Tan Troed and the site at the lake. We always have a

Plan B for if we don't get planning permission. We've never sold anything on. We take due diligence beforehand to minimise the risk of planning permission being denied.

Answer to unanswered concern from 3rd August meeting, provided in writing on 9th August:

Concern: *The Lake is quiet in the winter, which is good for wildlife. But there is people pressure on the wildlife there all year round; and the lake is flooding more and more often*

Answer: 'We have undertaken an assessment which demonstrates that there will be no recreational impact on the lake as actual visitor numbers will be reduced. This is the Shadow Habitat Regulations Assessment, a draft version of which is available on the PAC website.'

Additional question from a resident, submitted on 5th August:

How will you maintain the roof gardens? Roof gardens I've seen elsewhere looked very untidy?

Answer: [received in writing on 9th August]

'The proposed development will have onsite groundkeepers to maintain the site including green roofs.'

Note to all residents from Llangors Community Shop Committee

Mark Kerr, Chair of the committee, assured residents at both meetings that the stance of the shop committee on the proposal is neutral; that the committee serves the community and will support the stance taken by the community.

[Note from Sian: I assure residents of the same; I am a representative of the community, am neutral on the proposal in that capacity and will support the community's ultimate majority position on the proposal.]

Contact details for Green Parks Ltd:

Mark Gentle, Managing Director

Email: mark@ukcountryparks.com

Mobile: 0777 591 5756

Contact details for compiler of this report:

Sian Cox

County Councillor for Llangors with Bwlch

cllr.sian.cox@powys.gov.uk

0780 505 378

[Ends]