

# Matters Arising Statement

**From:** Rhys Davies, Cadnant Planning  
**On behalf of:** John Williams  
**Date:** 16 August 2016  
**Subject:** Hearing Session 10  
Allocations and alternative sites – Gwynedd – North  
Service Villages

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## 1. Introduction

- 1.1 This Statement should be read in connection with previous representations submitted (reps. No 036, 037, 038 and 039) in connection with Focussed Changes proposed under references NF78, NF127, NF128 and NF129.
- 1.2 Since the submission of those representations, additional ecological survey work has been undertaken in the form of detailed botanical and walkover survey during June 2016 and the findings of this survey work are reported in an updated report set out in Appendix A to this statement.
- 1.3 The updated ecological survey work demonstrates that the proposed draft allocations at sites T70 and T71 should not be progressed and site T58 should be allocated to deliver the residential need for the Serviced Village of Bethel.
- 1.4 A summary of details for the three sites at Bethel which are referred to within this Statement are set out in Table 1 on the next page.

*Table 1. Summary of details for sites T58, T70 and T71.*

Name/Ref of site	T58 Land at Saron	T70 Land adj. the B4366	T71 Land opposite Stad Rhoslan
Current status/use of the site	Agricultural land used for grazing	Agricultural land	
Proposed use	Housing	Housing	Housing
Size of site/scale/numbers of units proposed	7.17 ha 40 dwellings	0.94 ha 28 dwellings	0.70 ha 12 dwellings

## 2. Matters to be addressed

### Ecology

- 2.1 The updated ecological survey by Eco-scope (August 2016) provides site specific up-to-date ecological evidence in relation to site T58. The report concludes that the results of the earlier survey were concurrent. The habitat present on site T58 does not contribute to the ecological assets that makes Rhos-Chwilog (South) a candidate wildlife site. The wildlife site has been designated due to “marshy grassland” habitat, whilst the southern three fields of T58 consist of semi-improved ecological value.
- 2.2 Appendix III of the Ecological Assessment – August 2016 (included in Appendix A to this statement) makes comments on the Council’s two ecological surveys which are believed to have inform the decision of the JPPU to remove site T58 as a housing allocation for the delivery of residential development in Bethel. The view of a qualified ecologist is that the two surveys undertaken by the Council’s ecologist “were undertaken at a time of year which is sub-optimal for botanical surveys making the true nature of the habitat difficult to determine from these surveys... Neither report provides a detailed list of species present on the site.”
- 2.3 Appendix III of the Ecological Assessment – August 2016 also confirms that a visit was made to sites T70 and T71 and although a full survey was not undertaken, comments are provided on each site – a summary is provided below for ease of reference. For full details, see appendix III of the Ecological Assessment.

#### **T70 (adjacent to the B4366)**

- 2.4 A site which is heavily grazed by sheep and appears to be of little ecological merit.

#### **T71 (opposite Stad Rhoslan)**

- 2.5 A site which is currently grazed by a small number of horses and appears to support diverse botanical flora including unidentified species of Orchid. The site has both archaeological and ecological potential and the location is potentially high quality foraging site for bats.
- 2.6 The findings of the ecological survey work undertaken by Eco-Scope during August 2016 differ from those of Gwynedd Council’s Senior Biodiversity Officer. Given that the findings of the Eco-scope Assessment is based on a survey undertaken during June 2016 – a time of the year which is considered to be an optimal time for such surveys. It appears that

allocating site T70 (adjacent to the B4366) could result in the loss of a site which is of high ecological value and without further survey work, the ecological and archeological importance of site T70 cannot be determined. In light of this, the future deliverability of the site for residential purposes is questionable and draft allocation T71 can only accommodate up to 28 dwellings.

2.7 Furthermore, the findings of Gwynedd Council's Biodiversity officer (September 2012) which is included at Appendix B of this Statement, relate to an area of land which extends much further than site T58 (see map also included in Appendix B). The findings of that survey, do not therefore replicate the true ecological status of site T58. The findings of the Ecological Assessment by Eco-scope (August 2016) should be relied upon for the true ecological status of this site.

2.8 Informal discussions with JPPU officers suggest that, in terms of sustainability and deliverability, it would be preferable to allocate one site in Bethel for the deliverability of residential development. Site T58 was clearly the preferred housing site in Bethel and was included as a draft allocation in the Deposit JLDP. Site T58 has the capacity to deliver the required number of residential dwellings to meet the needs of Bethel. In light of the results of ecological survey work set out in Appendix A of this Statement, there are no ecological constraints which would affect the deliverability of the site, whilst the deliverability of site T71 is questionable due to its high ecological value. Site T70 alone, cannot deliver the required number of residential units for Bethel.

### **3. Conclusion**

3.1 In light of updated evidence, we continue to be of the view that the Deposit JLDP incorporating Focussed Changes should be amended to remove the allocation of sites T70 and T71 and to include the allocation of site T58.