

Surf Snowdonia: Phase 2 Proposals

Planning Statement

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Introduction

- 1.1 This statement sets out the planning context and background in respect of the proposals for what is collectively described as the Phase 2 works at the Surf Snowdonia facility at Dolgarrog.
- 1.2 The existing Surf Park opened in 2015 after the demolition and remediation of the former aluminium works on the site. The facility has subsequently established itself as a local, regional, national and international sporting venue and attraction. It was the first commercial artificially generated surf Wavegarden in the world. There is a similar facility in Texas and other schemes emerging in Europe and America but otherwise Surf Snowdonia remains a unique international destination.
- 1.3 The Phase 2 works seek to build on the attraction of the Park, diversifying the leisure element through the addition of a new activity building and by adding to the on-site accommodation choices through the development of a hotel, the establishment of a group of lodge buildings and the relocation of the existing accommodation pods within the site.
- 1.4 This report considers the planning background to the proposals and considers their acceptability against the policy framework and relevant tests. It is set out as follows:

Section 2 describes the site and the new proposals

Section 3 sets out the policy framework

Section 4 assesses the proposals against the policy framework, drawing from the suite of technical documents which have been prepared in support of the proposals

Section 5 provides a summary and conclusion.

Site and proposal details

- 2.1 The application site comprise the Surf Snowdonia facility at Conway Road, Dolgarrog. The history of the site and the facility is known to all parties. In brief the site was that of the former aluminium works which closed down in 2007; the land had suffered significant contamination over the years of industrial use and remained vacant subsequent to the closure. The Surf Park proposals for the site emerged in 2012 and after much political and professional input from all sides the facility received planning approval in April 2014. Construction began immediately and the Park opened for business to its first paying surfing clients in August 2015. It has operated successfully since and has established itself as a major tourist attraction in the region.
- 2.2 The business effectively runs for the 'surf season' opening in mid-March and running through to the end of October – then just 2 days a week in November and December. Apart from the standard maintenance programme in January there would be nothing to stop the facility running through the winter however the weather and demand does not make this feasible. One of the aims of the application proposals is to 'extend' the strictly seasonal nature of the Park.
- 2.3 The facility is a significant employer locally within the Conwy valley. At the height of the season the Park employs something in the order of 130 full and part time staff, averaging out around 90 over the season as a whole. Of those posts, a minor percentage could be described as full time permanent. Unfortunately the seasonal nature of the current Park operation means that the majority of the staff are temporary, employed for the season and then stepping down once the season ends with a view to returning the following year. This is not ideal in terms of employment security or consistency of income and again the proposals would seek to address this concern by extending the operational window of the Park.

The proposals

- 2.4 The proposals look to build on the popularity of the surf facility and essentially diversify and improve the offer, making it less seasonally

specific and enabling a transition to a more all year round facility. In summary the proposals comprise the following elements:

- i) The **retention of the surf lagoon** and all of the current ancillary buildings (bar/restaurant/changing accommodation/admin etc)
- ii) The **relocation of the existing accommodation pods** from their current location on the north side of the lagoon to a new cluster position on the south side of the site within the wooded areas and overflow car park
- iii) The development of a **new 106 bed hotel** on that part of the site vacated by the accommodation pods on the north side of the surf lagoon. The hotel will be served by its own dedicated access and parking provision. The aspiration is that the hotel is of a 4 star standard and as well as the accommodation it will incorporate the wellness spa, normal bar, dining, leisure, business and conference facilities
- iv) The development of a facility which for the purposes of the planning application is known as the **Activity building**. This involves the removal of the existing 'Crash and Splash' pool and the development on the same site of a new building which will house a range of adventure sport opportunities (caving, climbing, highwire etc) with some external drop and zip wire facilities.
- v) The establishment of a grouping of approximately 60 **lodge buildings** within the wooded area of the site to the east of the main car park. The grouping will be served by a service block and will be linked by internal walkways and routing
- vi) The establishment of an **external zip wire**, starting from a platform on the Activity building, oversailing the lagoon and landing close to the hotel on the northern side
- vii) The development of a pump track area for bikes and skateboards to the east of the surf lagoon.

2.5 The main vehicular access arrangements to the site remain as existing with the main priority junction to Conway Road requiring no amendment to accommodate the new uses. The hotel will be served by the secondary access off Conway Road which currently serves the pod units. Again no amendment will need to be made to this existing arrangement.

- 2.6 New planting, paving and landscaping will be brought forward both in association with the new built elements, in particular the hotel, but also around the wider site. The application is accompanied by a structural landscape plan with the detail to follow pursuant to any condition.
- 2.7 As stated the intention is that the new facilities will broaden the appeal of the Park away from its very specific focus on the surf lagoon and enable operation on a more year round basis, thus better securing and enhancing the major economic and employment benefit delivered by the site. The new facilities will increase the level of employment within the site as a whole as well as enabling some of the more seasonal roles to be extended across the year. Exact employment numbers will become clearer as the facilities become established but current expectations are that the hotel alone will generate something in the order of 110 full and part time jobs, equating to 65 full time equivalents. In addition the Activity building is likely to generate a further 26 full and part time posts. The benefits of such a scale of local employment, with the flexibility of full and part time posts and with the sector focus on younger persons employment cannot be overstated.

Planning policy context and framework

- 3.1 Planning policy guiding the consideration of the application proposals is contained within national legislation, Planning Policy Wales and the Conwy Local Plan.
- 3.2 In brief the policy context and framework can be summarised as follows:
- i) At a National legislative level Section 38 (6) of the **2004 Act** states that all development should be determined in accordance with the development plan unless material indications suggest otherwise;
 - ii) **Planning Policy Wales** reiterates this commitment from the 2004 Act, repeating it at figure 4.3 and noting at paragraph 4.2.4 that ‘a Plan led approach is the most effective way to secure sustainable development through the planning system’
 - iii) PPW goes on to state at 3.1.3 that in line with the presumption in favour of sustainable development
‘Applications for planning permission should be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise’
The paragraph concludes noting that material considerations must be planning matters, that the planning system does not exist to protect the private interests of one person against the activities of another and concludes that proposals should be considered in terms of their effect on the amenity and existing use of land and buildings in the public interest.
 - iv) At a local level the development plan identified as key in the PPW reference is the **Conwy Local Development Plan**, as adopted in October 2013. The Plan is relatively clear in terms of what it says about the Surf Snowdonia facility and the location of these proposals. In summary:
 - The proposals map shows the whole site as lying within the Dolgarrog village boundary, excluded from all of the neighbouring landscape designations

- Policies TOU1 and 2 relate to the whole site and provides strong support for the development proposals as follows:
 - a) Paragraph 4.4.2.1 notes that the Community Strategy recognises that year round tourist attractions are essential to the prosperity and wellbeing of the local economy.
 - b) Policy TOU1 supports the principle of new high quality all year round sustainable tourist development
 - c) Policy TOU (f) directly supports the establishment of new or converted high quality 4 and 5 star hotels which broaden the range of accommodation available
 - d) Paragraph 4.4.2.5 states that the Dolgarrog Aluminium Works is a prime example of where major tourism facilities could be developed
- v) In turn Policy TOU2 builds on this general position in stating specifically that:

‘Land at the former Dolgarrog Aluminium Works will be safeguarded for the purpose of an all year round sustainable tourism and recreation facility’

Paragraph 4.4.6.2 confirms that the phrase ‘tourism facility’ is one, such as Surf Snowdonia, which combines elements of both visitor accommodation and tourism attractions.

- 3.3 This broad framework provides the direct and positive framework against which the principle of the development is to be assessed. The Local Plan is clearly supportive of the principle of what is being proposed at Surf Snowdonia.
- 3.4 Other general Local Plan policies (economic and employment, nature conservation etc) and the more detailed development management requirements have been addressed as part of the suite of technical documents which support the application.

Planning Appraisal

- 4.1 The assessment of the planning application proposals needs to have regard to both the principle of what is being proposed and to detail of the individual elements when assessed in the overall context. The guiding principle in approaching any assessment is that as set out within the 2004 Act and PPW, namely that proposals that accord with the development plan should be approved unless material considerations indicate otherwise. An assessment against this approach is undertaken below.

Principle of the use

- 4.2 The application site lies within the development boundary of Dolgarrog and is identified under Policy TOU2 as being safeguarded for the purpose of an all year round sustainable tourism and recreation facility (ie one that combines attractions and accommodation)
- 4.3 Since the drafting of the policy wording and the adoption of the Plan the surf facility has been developed and as such the word 'safeguarded' has been slightly superceded. Nevertheless the policy TOU2 clearly anticipates that the full site will support a tourism facility and it seeks to maintain that use into the future. The surf lagoon comprises the successful first phase of those works. The current application, which in essence are the Phase 2 works, will be wholly in accord with policy TOU2 in that it proposes:
- a tourism attraction element in the form of the Activity Building facility, the zip wire element and the bike/skate park
 - Accommodation elements in the form of the hotel, the pod relocation and the lodge proposals.

With specific regard to the hotel development, given its aspiration to be a 4 star facility, it would benefit from direct support of Policy TOU (f) which states that the development of such facilities will be actively encouraged.

- 4.4 In addition the general aspiration of the Phase 2 proposals is to extend the seasonal nature of the current surf lagoon attraction through the

provision of an indoor element alongside the diversification provided by the hotel accommodation. This aspiration to become more 'year round' is directly supported at various points within the Local Plan and would deliver significant employment and economic benefit.

- 4.5 In every sense therefore there can be no doubt that the principle of the proposals are in full accord with the development plan. In line with the provisions of the Act and PPW, they should be supported and approved. The only reason there should be any departure from this is if other material considerations are assessed as overriding the very clear in principle support.
- 4.6 Any of those 'other material considerations.' which generally arise mainly out of the detailed assessments of the proposals, are then to be weighed in the planning balance undertaken to assess the acceptability of a proposal.

Detail of the use

- 4.6 The individual elements of the proposals are fully supported within the application documents in the form of plans and elevations alongside a suite of technical reports and assessments with the main ones covering highways, landscape, flood risk, drainage, arboriculture and nature conservation. Each of those documents considers the technical compliance of the proposals, testing any impacts arising and advising on the degree of harm and mitigation.
- 4.7 The technical reports cover matters in full detail but in summary it is evident that the following conclusions can be drawn
- with regards to **highway and traffic** matters the scheme proposals raise no issue. The Transport Assessment undertaken demonstrates that the main junction access into the site will continue to serve the site with no amendment necessary. Off site the highway capacity and modelling work undertaken demonstrates that the proposals do not raise any concerns on the existing highway network nor do they generate any amendment to any existing junction or signalling arrangement. The hotel access utilises the existing secondary pod access and again generates no requirement for either amendment or mitigation.

- with regards to **drainage matters** the technical assessment shows that whilst there will be some new onsite works required, both the foul and surface matter demands arising out of the development proposals can be wholly accommodate within the existing system capacity and that no adverse impact would arise
- with regard to matters of **flood consequence** the extensive physical work undertaken in respect of the Phase 1 development remains relevant and establishes the base parameters for this second phase. The updated flood analysis and appraisal shows that all of the new flood sensitive elements of building and development will lie outside of the more sensitive flood zone areas and that no adverse impact or knock on off site effect arises out of the new development proposals
- with regard to **arboriculture matters** a full review has been undertaken of the existing wooded areas and the ability to accommodate the siting of the proposed lodges and the resiting of the accommodation pods. Whilst there will be some tree management and selective thinning and removal, this will be done as part of a process of appropriate and long overdue arboriculture management of the woodland as a whole under the agreement and guidance of professional officers. The net effect will be the more effective management and forward retention of the existing tree and vegetation cover on the site.
- with regards to matters of **nature conservation/biodiversity** considerations the proposals have been worked up in full co-ordination and co-operation with the Councils officers, supported by the appropriate species survey work and information. It has been demonstrated that subject to suitable control and mitigation, no adverse impacts arise.
- with regard to **landscape and visual matters** the application plans, structural landscape proposals and cross section modelling work show how the proposals would sit within the site and would relate to the neighbouring uses and development. The hotel element is the largest part of the proposals but the analysis and conclusion demonstrates that it is sensitively located and designed, it sits well within its immediate and wider context, it is appropriate in scale to that of its neighbouring uses and that it raises no adverse landscape or visual appraisal concerns when considered within the permitted and policy supported use of the Surf Snowdonia site.

4.8 On this basis it is possible to conclude that there are no material considerations which should lead the decision maker to act in anything other than in accordance with policy guidance, namely that a development plan presumption in favour of approving the proposals arises in this instance.

Summary and Conclusions

- 5.1 The scheme proposals comprise the second phase of the Surf Snowdonia tourist facility at Dolgarrog. The initial first phase lagoon works and associated development has firmly established Surf Snowdonia as a major national and international attraction and as a major employer within the Conwy Valley.
- 5.2 The current proposals comprise a range of works which will add to and build on the success of the existing operation, securing its ongoing viability and further consolidating its contribution to the health and wealth of the local economy. The proposals, both individually and collectively, are directly supported by development plan policy which:
- encourages and actively directs the development of a tourist facility, including both accommodation and tourist facilities at the Surf Snowdonia site
 - encourages the development of 4 star hotel accommodation, which in itself accepts a necessary scale and range of facilities to support such a grading
 - encourages existing tourist facilities, with specific regard to Surf Snowdonia, to grow into all year round attractions; the essence of the phase 2 works is to do precisely that
 - encourages businesses to expand and to improve and strengthen their contribution to local jobs, expenditure and economic activity
- 5.3 The proposals would meet each and every policy statement and objective and as such enjoy in principle development plan support. National legislation makes it quite clear that in such situations there is a presumption in favour of approval which should only be set aside if there are clear and overriding material considerations. In such instances a planning balance would need to be undertaken.
- 5.4 Those material considerations would ordinarily relate to concerns arising in respect of the detail of the proposals. However, having reviewed the proposal against the suite of technical document which accompany the application, it is clear that the proposal raises no adverse impacts or concerns in relation to any technical consideration, be it highways, flood, drainage, nature conservation, arboriculture or landscape matters.

5.5 On this basis the approach to the determination of the application is clear, namely that:

- it is wholly in accord with and supported by the development plan
- there are no adverse impacts which would arise as material considerations

The application should therefore be determined in line with and reflective of the development plan support for the works. The planning balance in favour of the proposals is further tilted once the clear economic and social benefits of the proposal are taken into account. The benefits of the provision of potentially up to 150 new full and part time jobs into the local economy cannot be overstated. In this light a grant of planning permission for the scheme proposals as submitted would be wholly appropriate.