

PLANNING COMMITTEE	DATE: 19/03/2018
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE	CAERNARFON

**Number: 8**

**Application Number:** C17/1246/09/LL

**Date Registered:** 29/12/2017

**Application Type:** Full - Planning

**Community:** Tywyn

**Ward:** Tywyn

**Proposal:** Extension to existing caravan site, relocate amenity area, site 8 additional static caravans, relocate 4 caravans to extension and remove planning condition which restricts use of site to amenity area.

**Location:** Pant y Neuadd Caravan Park, Aberdyfi Road, Tywyn, Gwynedd, LL369HW

**Summary of the Recommendation:** TO REFUSE

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## 1. Description:

- 1 This is a full application to extend the existing static caravan park to greenfield land, re-locating the amenity area, site an additional eight static caravans in the extension and re-locate four caravans from the existing site to the extension and withdraw the planning condition that restricts the use of the site for an amenity area. There would be associated works in relation to the application, to provide a service road within the extension, create hardstandings for the caravans, parking spaces and landscaping work.
- 1.2 The static caravan park is located is on the periphery of Tywyn Local Service Centre with part of the site abutting, but outside the development boundary. The entrance to the caravan site is located near the entrance to the hospital, off the A492 class 1 county road, with a direct vehicular track leading directly to the site. A class 3 county road runs parallel to the eastern boundary to the site, with Snowdonia National Park designation beyond the road.

## 2. Relevant Policies:

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.
- 2.2 The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the seven well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.
- 2.3 **Gwynedd and Anglesey Joint Local Development Plan 2011-2026 adopted 31 July 2017**  
 TRA 2: Parking standards  
 TRA 4: Managing transport impacts  
 PCYFF 2: Development criteria  
 PCYFF 4: Design and landscaping  
 Policy PS14 The Visitors' Economy  
 TWR 3: Permanent static caravan and chalet and alternative camping sites  
 PS 19: Protect and/or enhance natural environment  
 AMG 5: Local Biodiversity Conservation  
 Supplementary Planning Guidance – Holiday Accommodation (2011)
- 2.4 **National Policies:**  
 Planning Policy Wales, Edition 9, November 2016.  
 Technical Advice Note 13 – Tourism  
 Technical Advice Note 18 – Transport

## 3. Relevant Planning History:

C09M/0003/09/LL: Change of use of part of the land to play area and dog walking area, together with variation of condition 4 on planning condition C04M/0097/09/LL to

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allow relocation of 2 caravans together with other improvements. Approved 9 March 2009

C06M/0163/09/MG Erection of store / works and creation of external storage area: Approved 29 November 2006

C05M/0036/09/LL Extension of static caravan site boundary so as to re-locate 8 static caravans, together with landscaping: Refused 24 March 2005

C05M/0031/09/AM: Construction of workshop/store together with formation of external storage area:  
Approved 20 April 2005

C05M/0029/09/LL: Conversion of existing workshop into self-catering holiday unit:  
Approved 29 September 2005

C04M/0208/09/LL Variation of condition 4 of planning consent C00M/0047/09/LL dated 17 April 2000 to allow for the relocation of 7 existing static holiday caravans on the existing park; change of use of land for the siting of 11 holiday caravans to include 8 existing static holiday caravans relocated from the existing park together with environmental improvements (increase from 81 to 84 static caravans) and change of use of existing workshop on existing park to holiday letting accommodation: Refused 15 December 2004

C04M/0097/09/LL: Amend condition 4 of consent C00M/0047/09/LL to allow the siting of 11 static caravans in lieu of 16 touring caravans:45637 Approved 4 August 2004

C03M/0146/09/LL Full application for the siting of 13 static holiday caravans in lieu of 16 touring caravans on the existing park: Refused 9 March 2004

C01M/0146/09/LL Application for variation of condition 2 on planning permission ref C00M/0047/09/LL dated 17 April 2000 to allow occupation of the caravans between 1 march in any one year and 14 January the following year: Approved 12 March 2002

C00M/0047/09/LL Retrospective application for change of use from 60 static caravans and 40 tourers to 67 static caravans and 32 tourers together with the variation of existing layout to provide for the siting of 70 static holiday caravans and 16 touring caravans in lieu thereof: Approved 17 April 2000

C96M/0019/09/CL Change of use from 67 static caravans and 32 touring caravans to 88 static caravans and 8 touring caravans: Refused 10 June 1996

5/79/25 Locate 9 additional static caravans : Approved 10 March 1986  
(Previous extant permission for 41 static and 51 touring caravans)

Y17/001607 A pre-application planning enquiry about extending the caravan site: Advised about the relevant policy and that 10% was the permitted increase, and that landscaping details would be required.

#### 4. Consultations:

Community/Town Council: No objection

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- Transportation Unit: I confirm that I have no objection to the proposal. The increase in the numbers is approximately 10%, however it is deemed unlikely to have a detrimental impact on the local roads network. The site is served by a direct entrance that leads off the nearby class A road, which is in a satisfactory location with sufficient visibility in both directions.
- Public Protection Unit: This site is a licensed site, and the applicant will be required to make an application to vary the site's licence to the Public Protection Service's Licensing Unit should this application be permitted. This development must comply with the requirements of the following Acts and Standards:
- Caravan Site and Control of Development Act 1960
  - Model Standards 1989
  - The Health and Safety at Work etc. Act 1974
- Biodiversity Unit: The applicant has submitted a Habitats and Reptiles Survey by Cambrian Ecology, dated August 2017. There was no evidence of reptiles or amphibians.
- The proposal would mean losing the following habitats:
- Loss of 400 square meters scrubland
  - Loss of 550 square meters of improved grassland
  - Loss of 32 meters of hedge
- However, the hedges surrounding the site would be preserved. Although developments should compensate for the biodiversity that is lost, I do not have an objection to the proposal. It is suggested that the development should adhere to the mitigating measures which are noted by Cambrian Ecology.
- Welsh Water: To note that there are some sewerage pipes and drains that are not recorded on our maps. It is suggested that the applicant contact Welsh Water directly to find the location of the sewer.
- Fire and Rescue Service: The Fire Authority has no observations regarding the access for fire vehicles and a water supply.
- Public Consultation: A notice was posted on the site. The advertising period ended on 5 February 2018. No letters / correspondence were received on the application.

## **5. Assessment of the material planning considerations:**

### **The principle of the development**

- 5.1 A number of policies within the LDP are relevant when determining the application. The main policy to consider when assessing the principle of the development is policy TWR 3. The relevant part of the policy in terms of this specific application, which is located outside the AONB and the Special Landscape Area, is part 4. This may permit small extensions to the site's surface and /or re-locating units from prominent locations to less prominent locations and a small increase in the number of units, subject to compliance with all the criteria listed below.

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- iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
  - v. That the proposed development offers substantial and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape.
  - vi. In terms of sites located within the Coastal Change Management Area, the proposed development is part of a wider plan to improve the safety of the residents of the caravans or chalets;
  - vii. That any increase in the number of static caravan holiday units or chalets is minor and is commensurate with the scale of any improvements to the site;
  - viii. That it is appropriate in the context of other policies in the Plan.
- 5.2 The proposal involves extending the surface area of the site to fields on the northern boundary of the caravan site, where part of it is used as an amenity play area and another part is wild land. It is proposed to re-locate the existing children's play equipment from the centre of the field to the side, to make space for eight additional static caravans and re-locate four caravans from the existing site, and associated work. Any further permission granted on the land in question would supersede any previous conditions that restrict its use to amenity use. The new provision would be likely to improve the range and quality of the accommodation offered to visitors, however, apart from improving density by re-locating four units, the proposal does not show a broader plan to improve the site facilities as a whole, and only proposes improvements within the proposed extension.
- 5.3 On the whole, the design and setting of the existing site is of a high quality. It appears that all the caravans on the site are of a green colour and that the overall setting is organised and tidy. Re-locating the four units to the new section would improve the existing setting of the site, as it would reduce the density of the units and somewhat improve the environment for the visitors. In relation to the site's appearance in the landscape, the site is well designed as there exists a natural screen that would integrate the new units into the landscape. It is also noted that further landscaping is proposed, such as rows of hedges to divide sections of caravans, and it is shown that the existing area of wild land and the hedges would be retained. Due to the high standard of the site in terms of design, setting and landscape, the application does not offer substantial improvements to the site itself, which may be a weakness within the application.
- 5.4 Although parts of Tywyn are within a Coastal Change Management Area, the site in question is not within the designation, and therefore, criterion 'vi' is not relevant.
- 5.5 Criterion 'vii' requires that any increase in the number of static caravan units is minor and is commensurate with the scale of any improvements to the site. The policy explanation, in para 6.3.75 details that it is possible for permission to be granted for a minor increase in the number of units on site if it is possible to demonstrate that the proposal offers substantial landscape and environmental improvements to the site and reduces its impact on the landscape. As previously explained, the improvements proposed are not numerous, and it is questioned whether the scale of the improvements shown are substantial enough to justify the extension and the eight additional units. The policy explanation further states, as a general rule, that a rough increase of 10% above the number of units that existed prior to making the original application is considered minor. When reviewing the caravan site's planning history, it appears that the number of units and the site surface area has increased substantially over the years. This current proposal is far higher than 10% above our earliest record for the site, which notes 41 static caravans and 51 touring caravans in 1986. The number of static caravans has increased gradually over the years, replacing the touring element. Over the past 30

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years the number of static units has doubled, and has already exceeded the 10% since the original application was submitted. The proposal is, therefore, contrary to criterion Vii of policy TWR 3 as neither the increase of eight additional static caravans nor the site extension are minor, and are not commensurate with the scale of the improvements proposed in this case. It is acknowledged that each application must be considered on its own merits due to the substantial variety of scale, nature and location; however, consistency and compliance with this very recent policy must be demonstrated.

- 5.6 Although the proposal is acceptable in the context of the other policies and the majority of the criteria of TWR 3, it does not outweigh the fact that the site has already been extended far beyond the 10% of numbers that were originally granted. It is therefore not considered that there is justification for the increase in numbers or the scale of the extension to the site.

#### **Visual amenities**

- 5.7 The caravan site is located on the outskirts of Tywyn and has been landscaped so that it is not prominent in the landscape. Policy PCYFF 4 states that proposals should integrate with their surroundings. The site extension would be in a small hollow, and the nature of the landform and the existing substantial landscaping would mean that the new units would probably assimilate with their surroundings. It is recognised that the site is located close to the Snowdonia National Park designation, where there is a duty to protect its visual amenities, however, having assessed the site's topography it is not considered that there would be an intrusive impact on the Park's scenery. The site extension would respect the landscape's natural contours, and would be enclosed by established trees and hedges. Although part of the hedge that separates the furthest field would be removed, it is proposed to retain the existing hedges around the boundaries and to retain the area of wild land and undertake further planting to separate the sections of caravans, which is encouraged. It is proposed to plant indigenous hedges. In relation to the safeguarding of visual amenities and landscape, it is considered that the proposal would neither have a significant detrimental impact on the area's visual amenities, nor would it significantly harm the setting of the National Park, and therefore the proposal would not be contrary to policies PCYFF 4 and PS 19 of the LDP.

#### **General and residential amenities**

- 5.8 The site extension and additional caravans would be located on fields to the north of the site. The nearest houses to the proposal are in the Gerllan residential estate, however as there is a whole field and landscaped boundaries separating them, it is not considered that the development would have a significant detrimental impact on the amenities of the local occupiers, and it is therefore not contrary to policy PCYFF2 LDP.

#### **Transport and access matters**

- 5.9 Policies TRA 2 and TRA 4 of the LDP involve assessing proposals in terms of their impact on road safety. The aim of the application is to increase the number of static units from 81 to 89. The Transportation Unit does not object to the proposal as there is a wide entrance with sufficient visibility in both directions and a road that leads directly to the site. It is unlikely that this increase would have a detrimental impact on road safety, and parking spaces have been allocated for the new units. Therefore, it is considered that the proposal complies with the requirements of the abovementioned policies.

#### **Biodiversity matters**

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- 5.10 Part of the extension to the site is improved grassland and most of the northernmost part of the field is wild land. As part of the application, a Habitats and Reptiles Survey by Cambrian Ecology was submitted. It shows that part of a hedge that separates the site would be lost, but the more nature trees would be preserved and additional landscaping is proposed. The survey confirms that no protected species were found on the site, although there is potential for birds to nest there. The Biodiversity Unit was consulted on the matter and stated that it had no objection to the proposal, but suggested a condition to adhere to the mitigation measures and the recommendations of Cambrian Ecology's survey. Based on the Biodiversity Unit's observations, it is considered that the proposal is acceptable in terms of policy aspect AMG 5 of the LDP.

## **6. Conclusions:**

- 6.1 Having examined the proposal in the context of the requirements of all the relevant policies, the increase of eight caravans and a site extension are considered to be unacceptable as the number of units proposed is not a minor increase, and is not commensurate with the scale of the improvements proposed for the site. Although the matters relating to visual amenities, general amenities, transport and Biodiversity are acceptable, the principles of policy TWR 3 cannot be disregarded so soon after the adoption of the plan that permits a 10% increase in the number of the original site. The site in question has already been extended considerably over the years. Based on the above assessment there is no choice but to recommend refusing the application.

## **7. Recommendation:**

- 7.1 To refuse

The increase in the proposed number of static caravans is not minor, nor commensurate with the scale of the proposed improvements to the site and it is above the recommended 10% increase to the original numbers on the site, therefore contrary to the principles of criteria vii of policy TWR 3 of the Anglesey and Gwynedd Joint Development Plan (July 2017).