

Committee	Communities Scrutiny Committee
Date	4 April 2019
Title	Over-development of Touring Caravan Sites
Cabinet Member	Councillor Dafydd Meurig
Author	Gareth Jones – Senior Manager Planning and Public Protection Service
Purpose	To raise awareness and give Committee Members an opportunity to scrutinise the Supplementary Planning Guidance: Facilities and attractions for tourists following public consultations, and offer feedback before it is considered by the Joint Planning Policy Committee.

1 BACKGROUND

1.1 In June 2017, the Planning and Public Protection Service was informed of the following:

- A number of Members felt that an increasing number of sites were being provided for touring caravans in some rural areas of the County and that this had a detrimental impact on views.
- It was otherwise noted that the green economy also benefited.
- It was suggested that it could be beneficial to restrict numbers by setting a quota.

1.2 The Planning and Public Protection Service had submitted reports about the subject to informal meetings of this Scrutiny Committee in October 2017 and February 2018. A picture was given of the relevant national and local planning policy context. It was explained that it was not possible to set a specific quota and that Policy TWR 5 along with the requirements of other Policies in the Plan provided a framework to consider the potential impact of proposed developments, including impacts on the visual amenities of open countryside. It is aimed to ensure that a proposed development is designed carefully and considers the context of the site and its location in the local landscape.

1.3 Members were provided with information regarding arrangements to prepare Supplementary Planning Guidance: Facilities and attractions for tourists (which would provide guidance on implementing the policies) and to hold a public consultation on it prior to its adoption. Members of the Scrutiny Committee were given information about the individuals and various organisations that would receive information directly about the public consultation.

1.4 It was resolved to request an opportunity to scrutinise the draft Guidance prior to its adoption.

2 THE PURPOSE OF SUPPLEMENTARY PLANNING GUIDANCE

- 2.1 It is essential to bear in mind that Supplementary Planning Guidance can only deal with providing more information or details regarding policies or proposals noted in the Local Development Plan.
- 2.2 Guidance cannot change a policy or proposals noted in the Local Development Plan and new policies cannot be introduced via Supplementary Planning Guidance.

3 THE STATUS OF SUPPLEMENTARY PLANNING GUIDANCE

- 3.1 When Supplementary Planning Guidance is adopted, it will be a 'relevant planning consideration' and it should be considered alongside the policies included in the Joint Local Development Plan. Figure 1 below provides a snapshot of the actions that are necessary for Guidance to be given a 'relevant planning consideration' status.

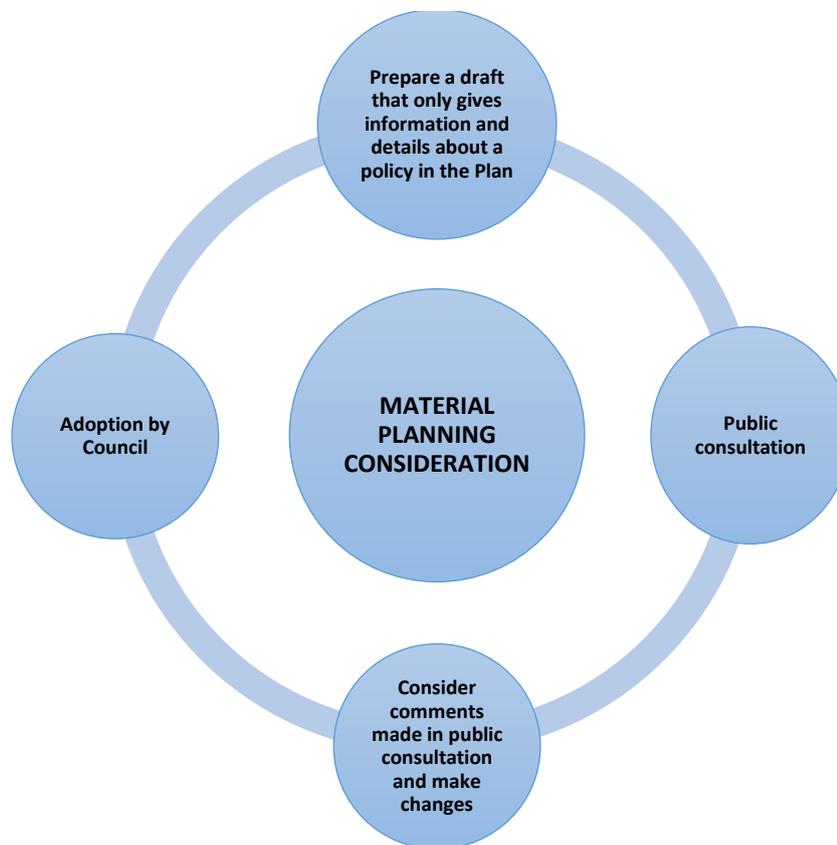


Figure 1

4 THE SUPPLEMENTARY PLANNING GUIDANCE: FACILITIES AND ACCOMMODATION FOR TOURISTS - TOURING CARAVAN SITES

- 4.1 The Local Development Plan includes policies that deal with many forms and scales of holiday accommodation and tourist attractions in the Plan area that require planning permission to be developed. Policy TWR 5 specifically relates to proposals to develop touring caravan, camping and temporary alternative camping accommodation. A copy of the full Policy is available in Appendix 1 of the Supplementary Planning Guidance (which is in **Appendix A** of this paper). Depending on the location and scale of the proposed development, other policies

in the Plan will also be relevant, e.g. policies regarding landscape, biodiversity, design, vehicular access (this is not a full list of potential matters).

- 4.2 In its role to provide further information or details regarding relevant policies in the Plan, part 3 of the Guidance provides guidance on overarching planning matters, and part 6 provides guidance on the main considerations of Policy TWR 5, namely: type of units, landscape considerations, highways considerations, implementation phases, ancillary facilities and overuse of hard standings and manufacturing features. The rest of the Guidance relates to other types of holiday accommodation and tourist attractions.

5 THE PUBLIC CONSULTATIONS ON THE SUPPLEMENTARY PLANNING GUIDANCE

- 5.1 A draft version of this SPG was approved for a public consultation by the Joint Planning Policy Committee on 26 April 2018. This draft was prepared in consultation with officers from the Development Control Unit and Tourism Unit of both authorities. The Supplementary Planning Guidance was published for a six week public consultation in accordance with the public consultation plan. **Appendix B** includes a Report on that Public Consultation. It contains a record of the public consultation arrangements, which included giving the following an opportunity to voice a formal opinion about the contents of the Guidance (this is not a complete list):

- Local members of both authorities
- Community, Town and City Councils of both counties
- Statutory Consultees
- Environmental Bodies
- Nearby Authorities
- Planning Agents who work specifically in both counties
- People / organisations who had expressed an interest in the Guidance
- The Tourism Unit of both Authorities sent details of the consultation to members of their tourism forums to ensure that all interested parties were aware of the new SPG and the opportunity to influence the contents. Membership includes:
 - Visit Wales
 - National Trust
 - Representatives of Tourism Associations
 - Adventure Companies
 - Enterprise Companies
 - Managers/Owners of Tourist Attractions
 - British Homes and Holiday Park Association
 - Managers/Owners of holiday accommodation/hotel/caravan site businesses

- 5.2 Details of the public consultation were uploaded onto both Councils' websites and hard copies of the SPG were also available to read in every public library, the head office of Anglesey Council in Llangefni and in Siop Gwynedd (Caernarfon, Dolgellau and Pwllheli). There was a number of different ways for people to respond to the consultation, including:

- On-line interactive form (created and managed by Gwynedd Council's Research Unit)
- On-line response form in Word and pdf - available on both websites and paper copies available in every library and Siop Gwynedd. Paper copies of the response form were also available on request from the Joint PPU.

- E-mail
- Letter

5.3 From the above, the Scrutiny Committee will see that representatives of several groups that would be interested in the guidance provided to applicants (and those advising them) on the expectations of the Planning Authorities regarding implementation of Policy TWR 5, have had an opportunity to voice an opinion.

5.4 The table in **Appendix 1** of the Report on the Public Consultation records the observations received, along with officers' response to the observations. A total of 34 responses were received about the original consultation, five general observations, two supportive observations and 27 objections. The table identifies and notes the necessary changes to respond to some of the relevant observations.

5.5 The table below summarises the observations received that are specifically related to touring caravan sites in the Guidance:

Organisation/Person	Type of Observation	Summary of the Observation	Officers' Observations and Recommendation
Bourne Leisure c/o Lichfields	Objects to paragraph 6.2.1	In terms of landscaping considerations, Bourne Leisure deems that the scope of evidence required for proposals involving touring caravan, camping and camping accommodation should be commensurate with the scale and nature of the proposals.	Accepted Agree that assessments should be commensurate with the proposal. Recommendation Change the wording of the paragraph to reflect the changes suggested by the objector.
Cadnant Planning	Objects to paragraph 6.6.2	The content of this paragraph goes beyond what is deemed acceptable by criterion 2 of policy TWR 5 and contradicts a requirement of criterion 1 of the same policy. Hard standings will be required for touring units if the development is one of high quality. Anglesey and Gwynedd are rural areas where rainfall is high. Therefore, hard standings are a vital requirement to ensure that such sites are of high quality.	Not accepted. It is considered that proposed developments permitted under policy TWR 5 are more acceptable in land use planning terms and have less impact on the landscape than static caravan sites as, due to their nature, they have temporary features that do not have a permanent impact throughout the year on the local environment. Excessive use of hard standings and other permanent features goes beyond the ethos of this policy. This is supported by paragraph

			<p>6.3.88 which states "An unobtrusive location is defined as one that is well screened by the existing landscape features and/or where touring units can be readily assimilated into the landscape without the need for too many man-made features, such as hard standings and fences."</p> <p>Recommendation No need to change the SPG in light of this observation</p>
Natural Resources Wales	Supports paragraph 6.6.3	It is noted that sustainable drainage systems (SUDS) are welcomed as systems to drain surface water.	Note the observation
Natural Resources Wales	Objects to part 6.2	<p>Design guidance would be useful in order to know what makes a development sustainable in the landscape and we recommend that you include design guidance for this type of development:</p> <ul style="list-style-type: none"> • Avoid excessive use of layouts in rows that have been strictly arranged • Follow the land-form pattern, pattern of fields, locations of trees and other natural/industrial features to integrate the development in a sustainable manner • Use natural colours in order to ensure better visual integration within the landscape • Reduce the impact of night lights. Use covered lamps in order to avoid prominent lighting 	<p>Partially Accept Design matters of caravan sites are unlikely to be addressed in any other SPG that is in the pipeline; however, it would be wise to include the principles within this SPG.</p> <p>Recommendation Include the design guidance as bullet points for consideration when dealing with planning applications</p>

5.6 After giving detailed consideration to all observations received and the proposed changes that would be necessary to meet some of the observations, the Joint Planning Policy Committee (November 2018) decided to conduct a further public consultation on specific changes to the Guidance relating to:

- i. How to define an excess of self-service accommodation
- ii. How to deal with change of use and losing hotels

5.7 **Appendix C** includes a Report on that Public Consultation regarding the second consultation on the SPG. The Report records the observations received about the second consultation. No further amendment to the Guidance is proposed in light of the observations received during the second consultation, and the Report on the Public Consultation gives reasons why this is unnecessary.

5.8 A COPY OF THE SUPPLEMENTARY PLANNING GUIDANCE IN **APPENDIX A** INCORPORATES THE RECOMMENDED CHANGES IN ORDER TO MEET THE SPECIFIC MATTERS RAISED DURING BOTH PUBLIC CONSULTATIONS REFERRED TO ABOVE.

6 NEXT STEPS AND TIMETABLE

6.1 The following table notes the next steps and timetable for delivery:

Action	When?
Joint Planning Policy Committee - to consider: <ul style="list-style-type: none"> i. observations of the Communities Scrutiny Committee; ii. feedback received during the second period of public consultation; iii. final draft copy of the Supplementary Planning Guidance in order to determine whether the Guidance is suitable for adoption or not (and, therefore, to replace extant Supplementary Planning Guidance about this subject). 	23 May 2019
Use the adopted Guidance as a relevant planning consideration	24 May 2019 onwards

7 Recommendation

7.1 Accept the report and consider the Supplementary Planning Guidance: Facilities and attractions for tourists submitted in **Appendix A**;

7.2 Determine whether there are any observations to be presented to the Joint Planning Policy Committee.