

Number: 3

Application Number: C20/0102/33/LL

Date Registered: 07/02/2020

Application Type: Full

Community: Buan

Ward: Efailnewydd / Buan

Proposal: Extend the existing touring caravan site to land nearby by creating a new access from the existing camping site, move the location of one touring caravan and add eight new touring caravans.

Location: Plas yng Ngheidio, Ceidio, Pwllheli

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This application relates to extending the existing camping site into adjacent agricultural land. It is proposed to create additional pitches for eight touring caravans as well as a new internal link road with a pitch to relocate one touring caravan from the existing site. As part the proposal, it is proposed to excavate the field where the caravans will be placed in order that its level is approximately one metre lower than its existing level. Timber post and pig netting fencing will be erected along the site's boundaries with a row of trees planted between the extension and the existing site (these have already been planted). Part of the new site would be used as an extension to the play area on the existing caravan and touring pods site.
- 1.2 There is planning permission for a site for 18 touring caravans and two mobile pods on a field east of the application site. Application number C17/0317/33/LL was also approved to permit a storage area for up to 30 touring caravans on alternative land within the farm's holding.
- 1.3 The site is located in open countryside within a Special Landscape Area. It is also located within a Landscape of Outstanding Historic Interest. The site is served by a class 3 road which runs parallel to the farm. The Cors Geirch Site of Special Scientific Interest (SSSI) is nearby which is also a Ramsar site and the Llŷn Fens Special Area of Conservation (SAC).
- 1.4 This application is an amendment of an application for eight additional pods on the same site that was refused on 22/07/2019 (application number C19/0090/33/LL).
- 1.5 The application is submitted to Committee as the site is owned by a Council member.

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 (Wales) Act 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 **Anglesey and Gwynedd Joint Local Development Plan 2011-2026, adopted 31 July 2017**
 TRA 2 – Parking standards
 TRA 4 – Managing transport impacts
 PCYFF 1 – Development Boundaries
 PCYFF 2 – Development criteria
 PCYFF 3 – Design and place shaping
 PCYFF 4 – Design and landscaping

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TWR 5 – Touring caravan, camping and temporary alternative camping accommodation

PS 19 – Conserving and enhancing the natural environment

AMG 2 – Special Landscape Areas

AMG 5 – Local biodiversity conservation

PS 20 – Conserving and enhancing cultural assets

AT 1 – Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens

Supplementary Planning Guidance – Holiday Accommodation (2011)

2.4 National Policies:

Planning Policy Wales, Edition 10, December 2018

Technical Advice Note 13 – Tourism

Technical Advice Note 18 – Transport

3. Relevant Planning History:

C19/0903/33/LL – Application to amend conditions 4 (season), 5 (holiday use only), 7 (submission and agreement of pod details) and 8 (agreement of storage details) attached to planning permission C14/1218/33/LL – Still under consideration.

C19/0090/33/LL – Creation of camping site for 8 pods, access road, parking spaces and extend amenity building – Refused - 22/07/19

C17/0317/33/LL – Change of use of part of an agricultural field to store up to 30 touring caravans during the winter months – Approved 8 June 2017.

C16/1090/33/LL – Increase the number of touring units from the 11 that were approved to 19 (in addition) and erect a washing facility – Approved 20 December 2016.

C14/1218/33/LL – Change of use of a field to form a touring caravan site for 11 caravans and two camping ‘pods’ along with the construction of a toilet/shower block and installation of a septic tank - Approved 27 March 2015.

C12/0718/33/LL – Improvements to vehicular access and engineering work - Approved 16 July 2012

C12/0195/33/LL – Site for 12 touring caravans and washing facilities - Refused - 19 April 2012.

C08D/0048/33/AM – Single-storey dwelling - Refused - 14 April 2008

C07D/0267/33/AM – Erection of two houses – Refused 19 September 2007

C02D/0035/33/LL – Agricultural shed - Approved 12 April 2002.

4. Consultations:

Community/Town Council: Support

Transportation Unit: No observations to offer

Natural Resources Wales: No objection – guidance for the applicant

Biodiversity Unit: Insufficient information has been submitted to confirm that there would be no detrimental impact on the Llŷn Fens Special Area of Conservation. The information submitted regarding landscaping measures is insufficient to assess their efficiency.

Public Protection Unit:	Not received
Fire Service:	No observations to offer
Welsh Water:	No observations to offer
Caravans Officer:	Concern, that if the site layout shown on the plans is followed then the caravans will be too close together and will cause a fire hazard. The layout shown would not be acceptable under the licence conditions.
Public Consultation:	A notice was posted on the site and nearby residents were notified. The advertising period has expired and no correspondence was received in favour or against the proposed development.

5. Assessment of the material planning considerations:

The principle of the development

- 5.1 As this is a site for touring caravans, the application has to be considered under Policy TWR 5 of the LDP that sets out a series of criteria to approve such developments.
- 5.2 Criterion 1 in policy TWR 5 states that any new touring caravan development should be of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and / or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape.
- 5.3 The proposed development is located in a field to the west of the existing touring caravan and mobile pods site. It can be seen from the cross-section plan, submitted as part of the application, that the field subject to the application is approximately three metres higher than the ground level of the existing caravan site. As part of the proposal, it is intended to excavate the field so that its level is lowered by approximately one metre. This means that approximately the lowest metre of the caravans would be sunken into the ground compared to the existing ground level. However, the highest part of the caravans would be visible. Trees have been planted along the site's eastern boundary, although no information has been submitted regarding the type of trees, the exact location planted and what maintenance programme will be in place to ensure they are successful as a screen to the site. Despite the effort to plant trees, it is considered that the site cannot be described as one that is well hidden by the existing features of the landscape and, considering all the proposed excavation and re-levelling the field, it is not believed that it can be said that it is easy to assimilate these units into the landscape (even if it is accepted that the landscaping proposed is sufficient).

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- 5.4 The field in question varies in terms of ground levels and is currently comparatively visible and open, especially from the A497 county highway above and near the Bryn Cynan roundabout, and on the approach from the roundabout down the slope towards the site and from sections of Cefn Morfa road, north of the site. As noted above, the application land is on a higher level than the existing touring caravan site and although it is intended to excavate approximately one metre in the field in order to place the caravans on the land, the upper part of the caravans would remain visible in the landscape. It is unlikely that the groundworks and planting would be sufficient to hide the caravans for some years, if at all.
- 5.5 Policy PCYFF 4 of the LDP requires that every proposal should assimilate with their surroundings and will refuse proposals that do not show how consideration has been given to landscaping matters from the outset as part of the design proposal. Although we realise what the applicant notes in terms of landscaping, however, as noted by the Biodiversity Unit, insufficient detail has been submitted with the application to show that the proposed planting and landscaping would be successful, indeed it is not proposed to undertake any landscaping along the site's northern boundary although the site is very visible from Cefn Morfa, south of Morfa Nefyn. In addition, Policy AMG 2 requires that a development should aim to maintain, enhance or restore the recognised character of the Special Landscape Area. It is not considered that approving a touring caravan site and all the associated work on this site would be of assistance to maintain, enhance or restore the character of the Special Landscape Area. Indeed, due to its location on higher ground, it is considered that the proposal would unavoidably cause further harm to the landscape of the Special Landscape Area which would be visible from the surrounding area. It is realised that it would be seen in the same context as the existing touring caravan site, however, granting this application would extend the harmful impact of the existing site on the landscape. A development of this nature and scale would therefore be likely to stand out obtrusively in the landscape and cause significant harm to the visual quality of the landscape and it is considered that the proposal is contrary to Policy PCYFF 4 and Policy AMG 2 of the LDP.
- 5.6 The site lies within the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest. The proposal involves extending an existing caravan site. In terms of its location and size, however, it is considered that the proposal would only have a local impact and that it would not have a wider impact on the historic landscape. Therefore, it is considered that the proposal is acceptable in terms of Policy AT 1 of the LDP.

General and residential amenities

- 5.7 Other than the Plas yng Ngheidio farmhouse, there are two dwellings in the vicinity of the application, namely a bungalow known as Tŷ Ni which is within the ownership of the farm, and the property opposite known as Graeanfryn. It is not considered that a site with eight additional caravans would be an over-development of the site and would not lead to additional traffic to an extent that would significantly harm local amenities. The Graeanfryn site itself acts as a Caravan and Camping Club exempt caravan site, therefore, the use in question would be unlikely to affect the property any more than it currently experiences. Therefore, it is not considered that the proposal would cause significant harm to the amenities of the local neighbourhood and the proposal is considered to be acceptable in terms of Policy PCYFF 2 of the LDP.

Transport and access matters

- 5.8 It is proposed to use the existing access to the site for the development. The Transportation Unit submitted observations on the proposal and they have no objection.

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Therefore, it is considered that the proposal is acceptable in terms of road safety and complies with Policies TRA 2 and TRA 4 of the LDP.

Biodiversity matters

- 5.9 Cors Geirch lies approximately 200 metres north of the site which runs parallel with afon Geirch. The marsh has been identified as a Ramsar site and a Special Area of Conservation (SAC) which is of international conservation significance. The marsh is also designated as a Site of Special Scientific Interest (SSSI) of national significance. In the original proposal for the touring site, namely C14/1218/33/LL, Natural Resources Wales expressed concern regarding the proposed sewage disposal system and the possible impact on the protected site. A condition was imposed on that application to provide a reed bed. However, more recently on application C16/1090/33/LL, the applicant had discussions with Natural Resources Wales at which an understanding was reached that installing septic tanks with a soak-away of a higher than usual quality would be acceptable. Details of these septic tanks were submitted as part of application C16/1090/33/LL, and Natural Resources Wales and the Biodiversity Unit were satisfied with these details and that the capacity was sufficient for the proposal.
- 5.10 The intention with the existing application is to connect to the existing septic tank, however, the Biodiversity Unit have voiced a concern as to whether or not the existing system is sufficient to serve the proposal in question. The observations of the Biodiversity Unit require the developer to submit evidence showing that the system can sufficiently cope with the additional volume generated as a result of connecting eight additional caravans to the system. On the grounds of the information submitted, it is not possible to fully assess the proposal against the requirements of Policy PS 19 and national planning guidance to ascertain if the proposal is likely to have an impact on the designated SSSI, SAC and the Ramsar site.

Licensing Matters

- 5.11 The Council's Licensing Enforcement Officer expressed concern that the site layout as designed would not be appropriate to receive a caravan site licence as a fire hazard would emanate from the proximity of the caravan pitches to each other. A detailed amended plan based on licensing conditions would be required showing compliance with the licence prior to recommending the approval of the application. Although these are not matters that deal directly with planning, this site extension would not receive a licence without planning permission and therefore even if this application is approved it would not be possible to implement the development. It would have been possible to request further details as suggested by the Licensing Officer, however, as there is a fundamental policy objection to this application it is not considered that there is any justification to place more costs on the applicant.

6. Conclusions:

- 6.1 Policy TWR 5 of the LDP requires that any touring caravan development should be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape. This development would be in a prominent place in the landscape and would inevitably be harmful to this landscape that is in a designated Special Landscape Area. Therefore, it is considered that the proposal is contrary to point 1 of Policy TWR 3 in the LDP.

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- 6.2 The site is visible in the landscape and the site in question is on a higher level than the existing touring caravan site on the farm. The site would be visible in the landscape and it is not considered that the proposal would integrate well with its surroundings. Neither does the application indicate clearly how consideration was given to landscaping matters as part of the proposal. In light of this, it is considered that the proposal would not do anything to maintain, enhance or restore the recognised character of the Special Landscape Area and the proposal is therefore contrary to the requirements of Policy PCYFF 4 and AMG 2 of the LDP.

7. Recommendation:

7.1 To refuse – reasons

1. The development would be harmful to the landscape and would not integrate appropriately into the landscape in open countryside. In light of this, it is not considered that the proposal would add towards maintaining, enhancing or restoring the recognised character of the Special Landscape Area and the proposal is therefore contrary to the requirements of Policy PCYFF 4 and AMG 2 of the Anglesey and Gwynedd Joint Local Development Plan.