

PLANNING COMMITTEE	DATE: 07/12/2020
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

Number: 1

Application Number: C19/0752/30/LL

Date Registered: 12-08-2019

Application Type: Full

Community: Aberdaron

Ward: Aberdaron

Proposal: Installation of 4 glamping cabins, toilet and shower block as well as the siting of 12 tents to be used by the residents of Canolfan Felin Uchaf

Location: Canolfan y Felin Uchaf, Rhoshirwaun, Pwllheli, Gwynedd, LL538HS

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This is a full application to install four self-service glamping cabins, erection of ancillary building to include toilets/showers, creation of camping site and other work including the creation of access driveway, access paths, landscaping, utility connection and installation of septic tank with associated water soakaway.
- 1.2 The current site is open green land with a post and wire fence creating the boundaries with a substantial growth of trees on lands surrounding the site itself. The proposed access serving this site leads through the existing centre along the private drive towards a hardstanding plot/car park created in the corner of the site, but has not received formal planning permission.
- 1.3 The site is located in open countryside outside any recognised development boundaries with the land located within the Western Llŷn Special Landscape Area in the Anglesey and Gwynedd Joint Local Development Plan, 2017 (LDP) and approximately 800m to the north-west of the Llŷn AONB. The proposal is associated with the Felin Uchaf Eco Educational Centre and is partly served by a class III county road and partly by an unclassified county road with the junction to the B4413 county road 1.76km (0.7 miles) to the north of the centre itself.
- 1.4 The application can be split into several elements, which include:-
- Creation of a new access driveway from a car park that has already been partly created in an adjacent field and then a number of permanent walking paths towards the individual cabins, and towards the toilet/shower block as well as the camping site on an adjacent field.
 - Erection of four timber cabins with a series of *skids* below them being anchored to the ground by using ground screws. Two types of cabins make up part of this application, namely, the *Eco-Pod* for 2-4 persons and the *Cruck Pod* for 2 persons. Internally, they will provide a living/eating/sleeping area and open kitchen, along with a separate shower/wash room. Externally, they will include an indoor sitting space near the door, manufactured from native natural timber. The floor area of the *Eco-Pod* cabin will be 23.8m² and the floor area of the *Cruck Pod* cabin will be 26m² with a height of 3.5m and 4.6m from the timber floor to the ridge. The information submitted as part of the application in the form of a Design and Access Statement notes that the cabins will include a series of *skids* on the bottom, which will then be anchored to the ground beneath them with screws and not directly to the ground itself.
 - Erection of a separate building to include showers and toilets for the campsite and it will be manufactured from timber (larch) and will have a green *sedum type* roof, with solar panels installed on the exterior surfaces of the roof. Its height will be 3.3m to the ridge with a floor area of 54m² and a decking area and a ramp on the northern elevation of the building. The building is anchored to the ground via a series of posts installed within concrete foundations and an electricity supply will be provided by using solar panels on the roof. The building is located on a plot of land between the holiday pods and the tent plot.
 - Installation of a sewerage treatment work in the form of a septic tank with a water soakaway and a connection to the four cabins, along with the separate shower/toilet building.
 - Installation of new electricity and water connections into the site from the current site, directly feeding into the cabins themselves.
 - Creation of tent/camp site with a total of 12 tents located informally within the plot of land.
 - Landscaping by planting trees and ‘cloddiau’.

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- 1.5 As referred to above, a Design and Access Statement was presented to support the application and it was noted that this latest proposal would be run in connection with courses and events held at Canolfan Felin Uchaf and that providing resources and accommodation facilities throughout the year is essential in order to enable the centre to produce a sustainable income via activities for a broad range of groups. Amended plans were received in relation to the design and plan of the shower/toilet building and additional plans showing the design and plan of the *skids* to be located under the floor of the glamping cabins. The applicant has confirmed that the cabins will be mobile and that they will be moved on *skids* and they have been designed so that they can be lifted and moved on the back of a lorry/trailer.
- 1.6 For information, no pre-application enquiry was presented regarding the proposed development and a request is presented to the Committee on the basis of the size of the proposed development area, with the application site measuring 0.56ha.

2. Relevant Policies:

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 3.1.2 of Planning Policy Wales emphasise that decisions should be in accordance with the Development Plan, unless material considerations indicate otherwise. The 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 **Anglesey and Gwynedd Joint Local Development Plan 2011-2026 (LDP) adopted 31 July 2017:-**
- Policy PS 4 – Sustainable transport, development and accessibility.
- Policy PS5 – Sustainable development.
- Policy TRA2 – Parking standards.
- Policy TRA4 – Managing transport impacts.
- Policy PCYFF2 – Development criteria.
- Policy PCYFF3 – Design and place shaping.
- Policy PCYFF4 - Design and landscaping.
- Policy TWR3 – Permanent static caravan and chalet and alternative camping sites.
- Policy TWR 5 - Touring Caravan, Camping and Temporary Alternative Camping Accommodation.
- Policy PS19 - Conserving and enhancing the natural environment.
- Policy AMG2 - Special Landscape Areas.

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Policy AMG3 - Protecting and improving features and qualities that are unique to the character of the local landscape.

Policy AMG5 - Local biodiversity conservation.

Supplementary Planning Guidance (SPG): Maintaining and Creating Unique and Sustainable Communities.

SPG: Tourist Facilities and Accommodation, March, 2019 (The 'sustainable' section of the SPG has been out to public consultation and is unlikely to change when the document will be adopted, therefore, some weight can be given to this document).

(Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Assessment, 2014 (Gillespies).

2.4 **National Policies:**

Planning Policy Wales, Edition 10, (2018)

Technical Advice Note (TAN) 13: Tourism.

TAN 18: Transportation.

3. **Relevant Planning History:**

3.1 Application number C11/0449/30/LL - erection of 10Kw wind turbine and installation of photovoltaic panels approved in September 2011.

3.2 Application no. C08D/0382/30/LL – erection of poly-tunnel for agricultural and learning use approved in September, 2008.

3.3 Application number C07D/0334/30/LL - change of use of shop to sell farm produce and hold courses approved in July, 2007.

3.4 Application number C06D/0056/30/LL - development of cultural and environmental study centre including an extension to the existing farmhouse, erection of new buildings and a car park and landscaping, approved in February, 2007.

4. **Consultations:**

Community/Town Council: No objection.

Transportation Unit: No objection as the applicant has identified a number of passing places along the road leading to the site and provide an additional parking space.

Natural Resources Wales: No observations, but propose standard advice in relation to managing the environment and the protected species.

Welsh Water: Standard advice.

Public Protection Unit and Licensing Officer: A licence would be needed along with compliance with the relevant legislation.

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It must be ensured that the proposal will not cause pollution or have a detrimental impact on surface water and/or ground water.

The success of the sewerage treatment system to reach an acceptable standard would be dependent on the size of the unit and it must comply with the current Building Standards.

Biodiversity Unit: There are no major concerns about the proposal as the Unit is already aware of the good work that has been carried out by the applicant to promote biodiversity on the site. However, more clarity would be needed regarding the biodiversity losses as a result of the development and how these losses would be mitigated.

Public Consultation: A notice was posted on the site and nearby residents were notified. The notification period has already ended and no response was received by the public to the request following the statutory advertisement period.

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 and the main policies that need to be considered here are Policies TWR3 and TWR5 of the LDP. Policy TWR3 is relevant to proposed developments where the units are let permanently on the site throughout the year with a physical connection to the ground or with permanent features. Policy TWR5 is relevant to proposals where the units are on the site temporarily with occupancy restricted to the period between 1 March to 31 October in the same year, with restricted connections to the ground and for them to be moved from the site when not in use. The applicant is of the opinion that Policy TWR5 should be considered here as the cabins or tents are not permanent in nature and they would have a restricted connection to the ground below and are covered under the definition of *a caravan*. However, for the reasons as explained in the assessment below, it is considered that Policy TWR3 also applies to the glamping cabins element of the proposed development.
- 5.2 The applicant explains that the four cabins will be installed on *skids* below them being anchored to the ground by using ground screws, which enables the cabins to be moved from the site if necessary for storage and maintenance purposes. Officers are of the opinion that the nature of the four cabins are **permanent** considering that electricity/water/sewerage is being individually connected to each cabin and that the applicant has confirmed in the Design and Access Statement that these are cabins that are directly designed in order to provide *full facilities* including a living/eating/sleeping area and open kitchen, along with a separate shower/toilet and an indoor sitting area. It is also noted that the cabins will be insulated. Although the applicant states that these are mobile structures, it is noted that they are being bound/connected directly to the ground by six screws to ensure that they are securely anchored to the ground below.
- 5.3 Paragraph 6.3.85, which is part of the explanation to Policy TWR5 states...*'In order to ensure that these temporary structures are being used exclusively for holiday purposes...the structures should provide basic holiday accommodation. They should only provide basic facilities for sleeping, seating and eating without installation of water services or provision of drainage facilities for WC, showers and washing.'* The cabin element of this proposal does not comply with the above explanation of what would be acceptable for temporary alternative camping

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accommodation in the sense of policy TWR 5. It is considered that the proposal to install permanent electricity and water connections to the individual cabins (following general touring caravan guidelines), creating a surfaced access road to them, paths and hardstandings (for all-year use) also creates permanent elements, as well as the creation of an excess of hardstandings, contrary to the analysis of the explanation of *basic holiday accommodation provision* within Policy TWR5. As well as the above, the Design and Access Statement confirms that the provision will be for all-year use (in order to enable the facility to be viable), and this, in turn, equates to the creation of **a permanent alternative camping site** that needs to be considered under Policy TWR 3. Although the applicant has referred in an e-mail that the *skids* allow for the pods to be moved for storage during the winter months in accordance with the statutory requirements for touring caravans, no further details have been submitted regarding where they would be stored and, in addition, this information from the applicant contradicts the content of the statement in the Design and Access Statement which confirms that it is essential that these facilities are used all-year to ensure the centre's viability and sustainability in the future.

- 5.4 Considering the above elements, the proposal would involve establishing permanent and static elements in nature and, therefore, the statement made by the applicant that Policy TWR5 is the only relevant policy for considering this application, cannot be agreed upon. To this end, it is considered that the cabin element of the proposal should be assessed against Policy TWR3 of the LDP. Indeed, Planning Inspectors in a recent appeal judgement in Gwynedd (APP/Q6810/A/19/3243019) for the siting of four canvas safari tents on a timber pole frame, footpaths, access track and parking area has noted that all of these elements equate to the creation of a permanent alternative camping feature, although the tents would be moved from the site at the end of each term. This appeal was refused based on the failure to comply with the criteria of Policy TWR3 rather than compliance with the criteria of Policy TWR5.
- 5.5 The site is located within the Llŷn Special Landscape Area (SLA) and therefore, consideration must be given to criterion 1 of Policy TWR3, which states "*proposals to develop new static caravan sites (i.e. a single or double caravan), new holiday chalet sites or permanent alternative camping accommodation will be refused in...Special Landscape Areas*".
- 5.6 The site and the surrounding area in its entirety is located within the Special Landscape Area 01 Western Llŷn, and is designated for the following reasons:-
- Close, rural landscape with a tranquil character.
 - Areas of complex field patterns with pockets of woodland and heathland.
 - The western half scores high across all scoring aspects *LANDMAP* High.
 - Important setting and significant views into and out of the AONB.
 - Under pressure as a result of tourism-related development.
- 5.7 Policy TWR3 does not permit the development of permanent alternative camping accommodation on sites within Special Landscape Areas. As noted above, it is considered that the cabin element of the proposal is one to create a new permanent site. The proposal does not therefore comply with the fundamental requirements of Policy TWR 3 in terms of the creation of new sites within a Special Landscape Area and, consequently, it is considered that the proposed development is contrary to the relevant requirements of TWR 3.
- 5.8 Given the above assessment, it is not believed that the principle of establishing a glamping cabin site is acceptable and based on the information submitted and the above explanation, it is

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considered that Policy TWR 3 is the relevant policy in order to assess the glamping cabin element and the provision of associated infrastructure. It is completely clear that policy TWR 3 does not permit the development of a permanent alternative camping accommodation site on sites within Special Landscape Areas and therefore there is no need to consider the remaining criteria in the policy. This policy has proved in many appeals since the adoption of the LDP and the decision of each appeal has confirmed the policy's requirements.

5.9 The other element of the proposal relates to the siting of 12 tents on an adjacent plot of land to the cabins and this element of the development can be considered under Policy TWR5 which states that proposals for touring sites, camping or alternative temporary camping accommodation sites will be permitted provided they comply with all the criteria noted:-

1. That the proposed development is of high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features - the proposal involves siting 12 tents in an informal form within an existing plot of open green land with the aim of creating two woodlands within the plot of land to provide shade and for the privacy of the tent users. It is estimated that four persons will accommodate each tent, with an extended car park for 14 vehicles located nearby. This plot of land is surrounded by 'cloddiau' and mature deciduous trees which measure approximately 4.5m high. A class III road network and unclassified roads are located nearby, along with a vast number of public footpaths. However, considering the setting of this plot of land within the broader landscape, as well as it being screened by existing vegetation, it is believed that only intermittent views and from a distance can be seen of the site and this would be the direction of elevated land on Mynydd Rhiw, looking down towards the north.
2. To avoid an excess of hard standing areas - the development involves creating a surfaced access road to serve the cabins and tents, paths and hardstandings (for all-year use), and extending the existing car park and from the information submitted with the application, it is considered that these elements would amount to the creation of excess hardstandings within the area that could currently be described as a natural green area with vegetation mainly comprising of coarse grass, brambles and scrub. Therefore, it is not believed that the proposal would comply with this criterion.
3. Its physical connection with the ground is restricted and allows it to be moved from the site in the closed season - assuming that common tents are to be located on this plot of land, it is believed that the tents will have restricted connection to the nearby ground, anchored to the land by brackets and cords.
4. Any associated facilities, if possible, should be located in an existing building or as an extension to existing facilities. As no suitable building is available, the need for additional facilities must be clearly shown and they must be commensurate with the scale of the development - the proposal is to locate a relatively substantially sized building (floor area of 75m² and a permanent structure), sited between the four cabins and the tent pitch, with a network of footpaths connecting the building to the holiday accommodation. It is also intended to create a hardstanding area for recycling immediately to the south of the car park, which is already partly created and it is to be extended further as part of this application. Although the building has been designed to be sustainable and sympathetic to its environment, no justification has been received from the applicant stating why such a facility cannot be accommodated within existing structures within the centre and why additional facilities of the size proposed here are necessary. Therefore, to this end, it is believed that building a substantially sized building as proposed here is not commensurate with the scale of this element of the proposal to site a maximum of 12 tents at a time only. Therefore, it is not believed that the proposal complies with this criterion.

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5. That the site is close to the main highway network and that adequate access can be provided without significantly impairing the character and features of the landscape - the centre is located approximately 1.76km from the class II county road (B4413) and the site is connected to the class II road by a class III county road along with an unclassified county road. It is intended to use the existing access to the centre and create an additional passing place in addition to the five existing passing places (although these are not formal) along the class III section of the road serving the site. It is not believed that the proposal will have a substantial detrimental impact on the features or character of the landscape. However, considering the distance between the application site (which has described in the Design and Access Statement as '*a remote site*' along with the assessment below regarding how sustainable and accessible the site is to alternative modes of travel to car use), it is believed that the site is not located within a comfortable walking distance for the prospective users of the service and it does not, therefore, comply with this criterion.
 6. The occupancy of the development is restricted to holiday use only - the application was submitted on the basis that the use of the proposed cabins and tents were for holiday use and associated with being run in connection with the centre's courses and events.
 7. That the site is used for touring purposes only and that any units are moved away from the site during the periods when they are not being used - the tent pitch will be used by the 12 tents and it is estimated that there will be four people in each tent. The Design and Access Statement refers to planning policy that relates to the former Development Plan which restricted the occupancy season of tents to between May and October (Policy D19 of the Gwynedd Unitary Development Plan), namely the season when use is intended in this latest application by the applicant. Today, this plan has been superseded by the current LDP and the policy now restricts the occupancy period to between 1 March and 31 October. Also, since the applicant contradicts himself by confirming that the intention is to use all camping units all-year based on the viability of the centre, this, in turn, would contradict the objective of this criterion, i.e. to restrict the use of camping sites to the period between 1 March and 31 October in any year. Given the above, therefore, it is not considered that the proposal complies with the requirements of this final criterion.
- 5.10 Based on the above assessment it is not considered that the proposal as a whole is acceptable in principle within the context of all requirements of Policy TWR3 and TWR5 of the LDP.

Visual amenities

- 5.11 As referred to above, the site is located in open countryside between the settlement of Rhoshirwaun and Mynydd Rhiw. The land is designated as Western Llŷn Special Landscape Area in the LDP and the Llŷn AONB is located approximately 800m to the south. A number of buildings and structures are dispersed in the catchment area of the site, including residential dwellings, smallholdings and farms. The site currently includes vegetation comprising of rough grassland, bramble and scrub with deciduous woodlands and established 'cloddiau' located around the site which is located in a slight dip in the landscape. There is a network of public roads and paths in the catchment of the application site; however, given the vegetation that already screens the site (the height of the cabins would be lower than the height of the current tree vegetation surrounding the site), it is believed that only intermittent and partial views can be seen of this site and that these views are from a distance. Also, it would be intended to improve and enhance the current features of the nearby landscape by planting new native vegetation within and around the site. Therefore, to this end, it is believed that the proposal would create an unobtrusive development that would not have a substantial harmful impact on the visual amenities of this

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rural area, in compliance with the requirements of Policy PCYFF3, PCYFF4, PS19, AMG2 and AMG3 of the LDP.

Residential amenities

- 5.12 Although the site is located in open countryside, a number of residential buildings are located in the catchment of the application site, including private dwellings and farmhouses. The nearest property to the application site is Ffermdy Tŷ Mawr, located 149m to the north-west, with the farmyard and agricultural buildings located between the farmhouse itself and the northern boundary of the centre. Given the setting and distance of the farmhouse in relation to the proposed tent pitch and glamping cabins, the established vegetation located between the farmhouse and the holiday units, along with the fact that Tŷ Mawr is a working farm, it is believed that the proposal would not have a substantial detrimental impact on the living conditions of Ffermdy Tŷ Mawr on the grounds of noise nuisance and loss of privacy. To this end, it is believed that the proposal is acceptable based on the requirements of Policy PCYFF2 of the LDP.

Transport and access matters

- 5.13 The current centre is served by a roads network that includes a class II county road (B4413) and class III road along with unclassified county roads. The site is located 1.76km from the class II county road and the site is connected to this road by a single road which varies between 3m and 5m wide (with one section of the road measuring 7m, but includes a passing place), including informal passing places for vehicles, i.e. the majority of these passing places are located near openings to nearby fields. The applicant has noted that five current passing places are located along the road, with the intention of adding an additional passing place in front of one of the openings to Felin Uchaf land. In response to the statutory consultation, the Transportation Unit confirmed that there is no objection to the proposal on the grounds of road safety or on the grounds of parking requirements and to this end, therefore, it is believed that the proposal is acceptable on the grounds of Policy TRA2 and TRA4 of the LDP.

Sustainability matters

- 5.14 It is considered that the main policies within the LDP which relate to sustainable development are Policy PS4, PS5 and PS14, as well as SPG: Tourist Facilities and Accommodation (2019) along with the advice included in the document Planning Policy Wales (PPW), Edition 10 (2018).

Policy PS4 states that a development can be sited to reduce the need to travel; Policy PS5 states that proposals should reduce the need to travel with private transport and encourage opportunities to be travelling as often as possible using alternative modes, placing special emphasis on, cycling and using public transport; Policy PS14 states that Councils will support the development of the local tourism industry on an appropriate scale in sustainable locations in the countryside and the SPG defines high quality development considering *(i) sites located in a sustainable location, i.e. close to current settlements where new developments can best be included in terms of infrastructure, access and habitat and landscape protection and sites that are not normally located in open countryside unless there is robust justification for this; and (ii) sites located near the main roads network and has good links to various modes of transport.*

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- 5.15 The explanation to the above local planning policies emphasise that sustainable tourism attractions and facilities of a high quality should be encouraged in the right places and possibly within development boundaries where visitors can access a range of services through a variety of modes of transport and that it is important that such developments follow sustainable development principles.
- 5.16 One of the main objectives of Welsh Government is to promote sustainable development in Wales and the planning system has a key part to play in this respect. For example, paragraph 2.45, 3.12 and 3.35 of PPW (which is reflected in paragraph 3.15 of TAN18: Transport) places the emphasis on reducing the need to travel and reduce dependency on the private car and increase the use of walking, cycling and public transport. In rural areas, the majority of new developments should be located in the settlements that can be comparatively well reached by non-car modes, compared with the rural area in general and that there is a need to balance the lack of access to public transport against the contribution that tourism makes to the rural economy in the specific area. Further guidance is provided in the document *Building Better Places: The Planning System Delivering Resilient and Brighter Futures - Placemaking and the Covid-19 recovery* (July 2020), which states:-
- "The planning system has a key role to play in continuing to reduce the need to travel and creating places which support sustainable and active travel. The planning system needs to support developments which are sited in the right locations, where they can be easily accessed by active and sustainable travel modes without the need for a car. It must maximise opportunities for people to make sustainable and healthy travel choices for their daily journeys and leisure."*
- 5.17 As referred to previously in the above assessment, the centre and the application site are located in open countryside and are not directly located adjacent to any settlement, with the nearest settlement, Rhoshirwaun, located 1.76km to the north. Within the Design and Access Statement, the applicant notes that the site is located approximately 3 minutes away from the village of Rhoshirwaun when travelling by car and that a bus stop is located within the settlement and that the site is accessible to various modes of transport.
- 5.18 The site is connected to Rhoshirwaun by single county roads which mainly vary from 3m to 5m in width and 1.76km long. The roads are narrow and winding in sections, without any pavement/footpath and despite the fact that no heavy traffic flow uses the local roads network, it is believed that the walking journey to Rhoshirwaun and other nearby areas would not be attractive to pedestrians since heavy vehicles such as tractors and service lorries use the local roads network. Reference was made by the Planning Inspector in a recent appeal (APP/L6805/A/17/3188351) to the content of the document *Manual for Streets, 2007* (Welsh Government and Department for Transport, Westminster Government), which states that pedestrians would probably consider a distance of up to 800m as a comfortable walking distance for, e.g. catching a bus. In this particular case, the nearest bus stop is located 1.76km to the north of the site along a narrow road which does not have a pavement.
- 5.19 No facilities are available in Rhoshirwaun itself and there are no services that would be of particular use to visitors to the proposed camping units, e.g. no convenience store available to purchase daily goods, whilst also noting that the proposed camping units are self-serviced. It is believed, in this context, that the nearest basic facilities are located in Aberdaron (4.7km to the west) and Sarn Mellteyrn (6.5km to the east). More populated settlements with a broader variety of attractions and facilities would be located further away from the application site, including

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Pwllheli, Abersoch and Nefyn - a journey that would, more likely, be travelled by private car rather than on public transport or on foot or bike.

- 5.20 Although the applicant has stated that visitors to the centre would attend courses and events within the centre's site, they have also noted that providing such holiday accommodation would promote the visitors to visit the beauty of Pen Llŷn and various and broad attractions in the area. Given the countryside location of this site, along with the dispersed settlements and attractions of Pen Llŷn, it would be reasonable to believe that it is unlikely that many journeys will be made on public transport, on foot or by bike, thus creating a dependency on the daily use of private transport.
- 5.21 Having considered the above assessment and given that the site is in open countryside, away from local infrastructure and access to facilities/services/attractions with a vast dependency on private transport, it is believed that the proposal would not equate to the development of a suitable location in the countryside; that it would not be a high quality development and that it would not meet the objectives of PPW for proposals that support sustainable development. Although it is acknowledged that opportunities for sustainable development are more restricted in rural areas, PPW advises that the majority of new developments should be located in settlements that can be reached comparatively easy by non-car modes, compared with rural areas in general. From this perspective, therefore, it is believed that the proposal is contrary to the requirements of Policy PS4, PS14 and TWR5 of the LDP as well as the relevant SPG, TAN18 and PPW that relates to sustainable development.

Biodiversity Matters

- 5.22 Policy AMG 5 of the LDP states that proposals should protect and, where appropriate, improve biodiversity identified as important to the local area. PPW states, in paragraph 6.4.5 - '*Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty), planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally...*'. The proposal involves undertaking extensive landscaping work, including planting 400 native trees and erection of mixed 'cloddiau'. In response to the statutory consultation process, the Biodiversity Unit has stated that although there are no major concerns about the proposal, more clarity will be required on the biodiversity losses as a result of the development and how these losses will be mitigated against. However, in this case, as there are other fundamental objections to the application and considering that the Biodiversity Unit is aware of the good work that has already been carried out to promote biodiversity on the site, it is not considered reasonable to ask the applicant to provide further information as this in itself would not mean that the proposed development is acceptable on the grounds of all relevant requirements. Therefore, despite the absence of this information, it is considered that the proposal can comply with the requirements of Policy AMG5 of the LDP (by holding further discussions and/or planning condition), should the principle of the proposal be acceptable in the first instance.

6. Conclusions:

- 6.1 Given the above assessment and having considered all relevant planning matters, including local and national policies and guidance, as well as the observations received, it is believed that this proposal is unacceptable as it is unable to satisfy the requirements of the relevant policies as noted.

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7. Recommendation

- 7.1 To delegate rights for the Assistant Head of Environment Department to refuse the application on the grounds of the following reasons:-
1. The proposal involved the creation of a new static alternative camping accommodation site within a Special Landscape Area. Policy TWR 3 of the Gwynedd and Anglesey Joint Local Development Plan, 2017, does not permit the development of new alternative static caravan sites within Special Landscape Areas. The proposal, therefore, is contrary to the requirements of policy TWR 3 of the Anglesey and Gwynedd Joint Local Development Plan, 2017.
 2. The proposal is contrary to criteria number 2, 4 and 7 of policy TWR 5 of the Gwynedd and Anglesey Joint Local Development Plan, 2017, on the grounds that the proposal would create an excess of hardstanding areas; no evidence has been received as to why the additional facilities are required and the tent pitch will be used for 12 months a year. The proposal, therefore, does not comply with all requirements of Policy TWR 5 of the Anglesey and Gwynedd Joint Local Development Plan, 2017.
 3. The proposal involves the creation of a new alternative camping site in open countryside and way outside any development boundary. In addition, it is not considered that the proposal makes use of a suitable site in the countryside as it is an unsustainable site where the majority of the visitors would be dependent on private vehicle use. The proposal, therefore, does not comply with all requirements of Policy TWR5, PS4, PS5 and PS14 of the Anglesey and Gwynedd Joint Local Development Plan, 2017, along with the advice contained in Supplementary Planning Guidance: Tourist Facilities and Accommodation 2019 and Planning Policy Wales, Edition 10, 2018.