

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

Number: 5

Application Number: C19/0746/46/LL

Date Registered: 27/08/2019

Application Type: Full

Community: Tudweiliog

Ward: Tudweiliog

Proposal: Provision of 8 touring caravans

Location: Trefgraig Isaf, Rhydlios, Pwllheli, Gwynedd, LL53 8LR

Summary of the Recommendation: TO APPROVE WITH CONDITIONS

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

1. Description:

- 1.1 This application was originally presented for siting ten seasonal touring caravans and four tents on the site of an existing Camping and Caravanning Club touring camp site (the certificate is for five caravans or motorhomes and up to ten tents). An amended plan was received and it was confirmed prior to the Planning Committee held on 1.3.21 that the proposal was to be amended by removing the camping element entirely from the proposal and reduce the number of caravans from 10 to 8. Therefore, to confirm, this proposal is for siting eight mobile caravans on the site. It is not intended to create hard-standings as part of the development, and the existing resources would be sufficient for the proposal by using the existing entrance, the toilet block and bin storage that are already on part of the site.
- 1.2 The site is located in open countryside within the designations of the Western Llŷn Special Landscape Area and the Llŷn and Bardsey Landscape of Outstanding Historic Interest. The site is not within the AONB. The site is accessed by a comparatively narrow and winding unclassified road, with the location approximately one mile from the nearest junction with the B4413 highway, while it is a distance of approximately 4.7 miles to the village of Aberdaron to the south west, and approximately 3.7 miles to the village of Sarn Mellteyrn to the north east.
- 1.3 The existing site is on green land surrounded by hedges, which means that it is hidden within the adjacent area and therefore protects views in and out of the site, including any elevations that could have a visual impact on the AONB. There are scattered houses nearby, and agricultural lands beyond.

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 **Anglesey and Gwynedd Joint Local Development Plan 2011-2026, adopted 31 July 2017**

PS 5: Sustainable development

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PCYFF 4: Design and landscaping

AMG 2: Special Landscape Areas

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

PS 19: Conserving and where appropriate enhancing the natural environment

PS 4: Sustainable transport, development and accessibility

TRA 2: Parking standards

TRA 4: Managing transport impacts

PS 14: The visitor economy

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

PS 20: Preserving and where appropriate enhancing heritage assets

AT 1: Conservation areas, world heritage sites and registered historic landscapes, parks and gardens.

Also relevant in this case are the following:

Supplementary Planning Guidance: Tourist Facilities and Accommodation

2.4 **National Policies:**

Future Wales: The National Plan 2040
 Planning Policy Wales (Edition 11 - February 2021)

Technical Advice Note 13: Tourism

Technical Advice Note: Transportation

3. Relevant Planning History:

3.1 It does not appear that this specific application site has any planning history.

4. Consultations:

Community/Town Council: No observations at the time of the original application. A second consultation was held after the application was amended, and a comment was received noting that it should be ensured that the washing and toilet facilities were suitable before adding the eight mobile caravans.

Transportation Unit: No objection at the time of the original application. Further confirmation was received that there was no objection to the amended plans.

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

Natural Resources Wales: No observations

Welsh Water: Not received

Public Protection Unit/Licensing: Observations on the original application noted that the submitted plans show an insufficient space between the units in order to comply with current requirements, amended plans are requested to ensure that the positioning is acceptable, or to reduce the requested number of units. A response was received to the second consultation noting that there is no objection to the development provided it satisfied licensing conditions.

Rights of Way Unit: Not received.

Public Consultation: A notice was posted on the site and nearby residents were notified. The advertising period has expired and no letter / correspondence of objection has been received.

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 the requirements of 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. In this case, it must be considered that this is an application on a site which has already been used under a Camping and Caravanning Club licence as a touring caravan site, though on a smaller scale in terms of caravans but also includes a camping element.
- 5.3 Concern was stated by the Licensing Unit as it was not clear from the plans whether the distance between the touring caravans would be sufficient, as a space of more than 6 metres in width must be allowed between touring caravans for an awning, car and three clear metres. If the site does not meet licensing standards, it is not believed that it can be considered as a "high quality" development. It was noted on various occasions and through further discussions, that satisfactory site arrangements for licensing purposes could be secured by submitting amended plans. As noted

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

above, an amended plan was received in due course which shows a reduction in the number of caravans on this site from what was originally intended and the removal of the camping element entirely from the proposal. It is believed by now that the setting of the site as shown in its amended form is acceptable and confirmation was received from the Licensing Unit that the setting and the distances between the sites are now acceptable.

- 5.4 It is accepted, due to the existing vegetation, that this development would be well hidden in the landscape.
- 5.5 Because of the amendments made to the proposal, it is believed that the application contains sufficient information to demonstrate that it meets the requirements of policies TWR 5, PCYFF 3 a PCYFF 4 of the LDP.

Visual, general and residential amenities

- 5.6 It is not considered that the development would have a significant additional detrimental impact on local amenities as the existing established landscaping suitably screens the site. It must also be recognised that the site is currently used through the licensing arrangements by the Camping and Caravanning Club which is not subject to planning permission. Therefore, it is not considered that the proposal would cause significant harm to the amenities of the local neighbourhood in this respect, and the proposal is considered to be acceptable in terms of Policy PCYFF 2.

Transport and access matters and sustainability

- 5.7 Access to the site is from an unclassified road which links to the B4413 highway approximately one mile to the south east of the site. The transportation Unit has no objection to the proposal.
- 5.8 Point 12 of Policy PS 5 relates to sustainable travel. However, it is acknowledged that it is not a site that can be reached through various ways including walking, cycling and public transport. Nevertheless, given the situation and the existing use of the site, it is highly likely that a high number of movements can stem from the use of the caravans and camping and by limiting the existing application to the use of eight touring caravans only, it is believed, on balance, that the current proposal is an improvement on the use permitted by a Camping and Caravanning Club licence.
- 5.9. Proposals that require the use of private vehicles are not prohibited by the LDP, Policy PS 5 promotes the application of sustainable development principles in all new developments, including reference to the most appropriate locations, and reducing the need to travel by private transport.
- 5.10 However, the fact that the site is currently used as a campsite for caravans and tents must be considered. Evidently, the current proposal to have eight touring caravans would lead to an increase in the number of vehicles visiting the site towing caravans. Nevertheless, and as already explained, this would be an increase of three and by removing the camping element, it is likely there would be an overall reduction in movements linked with the site.
- 5.11 Therefore, given the existing use and the numbers of the proposal in its amended form, it is not believed that it is unacceptable based on the relevant requirements of TWR 5 and PS 14.

Planning History

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

- 5.12 As noted above, it must be acknowledged that the site's existing use is licensed under the Camping and Caravanning Club's arrangements, and therefore it is accepted that there is established use. A licence would permit up to five touring units and up to ten tents. To establish what the fallback position would be and to compare visitor numbers to the site over a period with the anticipated numbers deriving from the current proposal, records were requested in order to establish whether there would be a likely difference between the historical use of the site and its intended use. Though this information was not received, it is now believed that the difference will clearly be smaller as the camping element is removed from the proposal. The small increase which would allow eight caravans, when compared with the existing permission for five caravans and up to ten tents is obvious and it is believed that using relevant conditions would lead to an improvement.
- 5.13 Consequently, it is believed that the proposal in its amended form complies with Policies TWR 5, PS 4, PS 5 and PS 14 of the LDP.

Language Matters

- 5.14 In the case, it is not considered that the proposal reaches the threshold requirements of PS1 in relation to the need to submit a Welsh Language Statement, specifically:
- 5.15 Considering the scale and type of the proposed development, the proposal would not be relevant to the categories as defined by criteria 1a, 1b and 1c, and therefore a statement will not be required based on these requirements within Policy PS 1.
- 5.16 Due to the proposal's size there is no need for a Language Assessment under criterion (2) of Policy PS 1.
- 5.17 If a Language Statement is not required, consideration should be given to the Welsh language in accordance with the arrangements for screening applications within Appendix 5 of 'Maintaining and Creating Distinctive and Sustainable Communities SPG'. Given the guidance as outlined in the SPG, the agent was asked to submit a statement that has given appropriate consideration to the Welsh language. No response was received at the time of writing this report but if it is received, the matter will be discussed orally during the committee. In addition, it is believed that it would be reasonable to set appropriate conditions to ensure that there is bilingual signage to comply with category CH 1 of the appendix, and criterion 4 of policy PS 1 that relates to bilingual signage.

6. Conclusions:

- 6.1 This site has been established for camping and touring caravanning use by arrangement of a Camping and Caravanning Club licence. The existing use means that five caravans can use the site and up to ten tents. The amended proposal removes the tent element from the proposal and provides for eight touring caravans only. It is therefore seen that there is an increase of three caravans between the existing caravan use and the proposed use as the camping elements is being removed from the proposal. This increase is probably negligible when compared with what could be operated from the site by using the camping permission. Restricting the use of the site to eight touring caravans only would reduce the use of the site and, consequently, the local impact. Having assessed and weighed-up the development in its amended form as a whole against the requirements of

PLANNING COMMITTEE	DATE: 12/04/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION MANAGER	

all relevant policies, we must come to the conclusion that the proposal is now acceptable. The form and positioning of the units as shown on the amended plans shows an entirely acceptable layout as there is adequate space between the individual plots, meaning that it is an acceptable development, and is in accordance with criterion 1 of policy TWR 5 which notes the need for a proposed development to be of a high quality in relation to its setting and appearance.

7. Recommendation:

7.1 Approve – conditions

1. Time
2. In accordance with the amended plans
3. Limiting the numbers and use and no tents to be put up within the application site
4. Bilingual signage plan

Note:

Need to ensure an appropriate licence