

<b>PLANNING COMMITTEE</b>	<b>DATE: 21/06/2021</b>
<b>REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER</b>	

**Number: 6**

**Application Number: C20/0348/35/LL**

**Date Registered: 01/05/2020**

**Application Type: Full**

**Community: Llanystumdwy**

**Ward: Llanystumdwy**

**Proposal: Use of land for permanent alternative camping / glamping.**

**Location: Land near Coed Mawr, Cricieth, LL52 0ND**

**Summary of the  
Recommendation: TO REFUSE**

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

**1. Description:**

- 1.1 This is an application to use land for permanent alternative camping / glamping to comprise 8 holiday pods, 1 service pod ('utility') and 2 container storage areas together with sewage treatment works and alterations to the existing access including providing a bus stop.
- 1.2 The site (an agricultural field) is located in open countryside and outside any special landscape area identified in the LDP. However, it is situated within the candidate Coed Mawr Wildlife Site. The site is surrounded on 3 sides by mature trees, as well as trees and hedges along the western side of the site. The woodland directly east of the site is identified as an Ancient and Semi-natural Woodland. It is also noted that the site lies within a B flooding zone.
- 1.3 The pods will be located on the western side of the new access road, that will run from the south to the north through the centre of the site. The pods will be connected to a sewerage treatment system and the proposal would provide a surface water drainage network.
- 1.4 The timber pods will measure 6m long by 3.3m wide and 3m high. They will be clad with Western Red Cedar planks or Siberian Larch, with uPVC doors and oak windows. The pods will be painted in a calm, environmental colour. Internally they will provide one double bed, cooking/relaxing space and a bathroom. A parking space will be provided for one car near the side of each pod.
- 1.5 The 2 container stores will have timber cladding. The proposal does not highlight the justification for the storage or what colour it is proposed to paint them. No information has been submitted regarding the proposed service pod.
- 1.6 New, native species of trees and shrubs will be planted within the site.

The site will be served by the existing agricultural access off the B4411 highway and will be altered to provide larger visibility splays and this will entail erecting new stone walls to provide this. The proposal does not note what materials it is proposed to use for the road surface. It is noted that the existing access is unsuitable for vehicles and as part of the development it is proposed to make significant alterations to it that entails providing better visibility splays. It is also intended to provide a 'bus waiting area' near the access.

- 1.7 The following documents and information have been submitted as part of the application:

Ecological Assessment

Flood Consequence Assessment

Drainage Strategy

Transport Assessment

Design and Access Statement

Civil Engineering Plan

Tree Impact Assessment (BS: 5837/2012.)

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

1.8 The application is submitted to the Planning Committee for determination as the site exceeds 0.5ha.

## 2. Relevant Policies:

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 1.22 of Planning Policy Wales emphasise that planning decisions should be 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

PS1: The Welsh Language and Culture

PCYFF 1: Development Boundaries

PCYFF 2: Development criteria

PCYFF 3 : Design and place shaping

PCYFF 4: Design and landscaping

PS 5: Sustainable development

PS 6: Alleviating and adapting to the effects of climate change

PS 4 : Sustainable transport, development and accessibility

TRA 2: Parking standards

TRA 4 : Managing transport impacts

PS 14: The Visitor Economy

TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping

PS 19: Conserving and enhancing the natural environment where appropriate

AMG 3: Protecting and improving features and qualities that are unique to the character of the local landscape

AMG 5: Local Biodiversity Protection

AMG 6: Protection Sites of Local or Regional Significance

SPG Tourist Facilities and Accommodation (2021)

SPG Maintaining and Creating Distinctive and Sustainable Communities (2019)

<b>PLANNING COMMITTEE</b>	<b>DATE: 21/06/2021</b>
<b>REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER</b>	

## 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 - 18 Transport

## 3. **Relevant Planning History:**

3.1 The site has no relevant planning history.

## 4. **Consultations:**

Community/Town Council: It is not within the Town Council's boundaries, however, concern has been expressed regarding the access to the road and that it is extremely hazardous as it is close to Rhydybenllyg bridge and is also on a bend.

Transportation Unit: Visibility from the access is acceptable to me, with a full view of the bridge and up the road from Rhoslan. I have suggested to the applicant that it will be necessary to regrade the levels of the access road on their land as it currently falls down quite steeply to the site. The agent's plans do not show levels, only the intention to widen the gateway by erecting walls on a radius, and I propose an appropriate condition for the levels.

### Response 01/06/2021

Thank you for confirming which plans are relevant to the application.

I confirm that I have neglected the bus stop element on the plans, and I have focused on the location and design of the vehicular access in relation to its impact on the bridge bend.

In terms of the proposal to provide a bus stop, without the agreement of the Environment Department (including input from the Transportation Unit and the Transport Unit) it is unlikely that the 'stop' would be considered as official and operational.

The main considerations are the need, a safe location for users and a safe location in terms of other highway users.

In this case, the need is not obvious. Although it would offer an opportunity for visitors to catch a bus to Cricieth, it is likely that the majority would choose to use a private vehicle to travel throughout the County if they wish to leave the site on holiday.

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

In terms of a safe location for users, the stop site offers a flat area beyond the highway to wait, but only on one side of the road (Cricieth direction), without a means to provide a similar area on the other side of the road or for people alighting from the Cricieth bus, and therefore this causes concern in terms of safety and the ability to cross and wait safely for a bus.

The location of the 'stop' also causes concern in terms of highway safety. It is close to the bridge bend, and although large vehicles pass daily, having a bus stopping in the road for a period to pick-up or drop persons is likely to impair other movements travelling over the bridge. In addition, this may lead to vehicles trying to pass the bus while it is stationary, leading them to cross the bridge on the wrong side of the road around the bend.

As a result of the above, and the unlikelihood the Council will accept the bus site as an official stop, I recommend that this element is removed on the grounds of highway safety.

Natural Resources Wales:

**Flood Risk** - We are satisfied that the mitigation measures outlined in the LDP are sufficient to get to grips with the risk of flooding that is linked to the site. Therefore, we have no objection to the development on condition that the following is included in any planning permission given:

**Condition:** The finished floor level of the pods will have to be at least 450mm higher than the ground level.

**Foul Water Drainage** - The application originally proposed private treatment works. However, the site drawing we received on 27 November 2020, proposed a 'foul storage tank' that suggests the use of a cesspit. We questioned such a use as it is not environmentally sustainable and the applicants have amended the site plans further to offer private treatment works, that appears to be acceptable.

**Protected species** - We note that the Preliminary Ecological Report submitted in support of the above application (Cambrian Ecology, updated 2 December 2020) has noted that no European Protected Species use the application site. Therefore, we have no comments to make on the application as submitted.

However, we would recommend that you consult your ecologist regarding any Invasive Alien Species noted on the site.

Welsh Water:

State the usual observations and advise the applicant to contact Natural Resources Wales as it is proposed to develop a private sewage treatment system. Need to re-consult if the situation changes

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

and need to connect to the main sewer.

Tree Officer (Transportation  
and Countryside Service)

The site is surrounded by trees, Coed Mawr is listed as an ancient woodland site. The pods are located fairly close to the trees / clawdd that border the site, therefore it would be necessary to ensure that the pods do not lean into the RPZ (root protection zone) of the trees. Also, information is required about on what the pods will stand, as this may have an impact on tree roots if they are too close to the RPZ. Has a BS:5837/2012 tree report been submitted with the application?

Land Drainage Unit (Gwynedd  
Consultancy)

Our maps show that a watercourse runs along the development site boundary, but it does not appear that the plan would disrupt the river flow in any way. Nevertheless, the developer is advised to avoid installing / constructing any structures within 3 metres to the course of the river as this could impede future maintenance. Additionally, an Ordinary Watercourse Consent will be required for any work that could affect the river flow and FCRMU@gwynedd.llyw.cymru should be contacted for further advice.

Due to the size and nature of the development, an application will need to be submitted to the SAB for approval before construction work commences. A sustainable drainage strategy and an associated plan have been submitted with the planning application, but until an application is submitted to the SAB, there is still some uncertainty on whether the proposed site plan will enable the development to fully comply with the series of national SuDS standards.

Biodiversity Unit

The applicant has provided a Preliminary Ecological Report delivered by Cambrian Ecology dated 23 November 2019. I can confirm that the survey and the report have been produced to a good standard.

The site lies within the Coed Mawr Wildlife Site that links directly with the afon Dwyfor Wildlife Site.

I have no objection to this application as long as mitigation measures (nesting birds, afon Dwyfor protected species) noted in section 8 of the report by Cambrian Ecology, as well as the biodiversity improvement measures noted in section 9 of the report are added to the development plans. This includes producing an INNS biosecurity plan (Invasive Non Native Species) for the Himalayan Balsam issue on the site, the pollution prevention plan for the watercourse as well as the mitigation measures noted in the arboriculture report.

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

Public Consultation: A notice was posted on the site and nearby residents were notified. The advertising period has expired and correspondence was received objecting on the following planning grounds.

- An excess of this type of holiday accommodation in the area
- Highways matters
- Biodiversity Matters

As well as the above objections, objections were received that were not material planning objections and these included:

- It is not believed that the applicant is the landowner.
- Work has already commenced on the site

Correspondence was received supporting / providing observations on the application on the grounds of:

- Benefits to the local economy
- Lack of provision of this type of holiday accommodation.

## 5. Assessment of the material planning considerations:

### The principle of the development

5.1 The application involves establishing a new permanent alternative camping accommodation site. Policy TWR 3 of the LDP supports proposals to develop new sites of this type if they are outside the AONB and the Special Landscape Areas and if they conform to several specific criteria within the policy. The site in question is not located within the AONB and is not in a Special Landscape Area and therefore in principle the suitability of the site for permanent alternative camping accommodation can be considered as long as the proposal meets with the criteria in Policy TWR 3, namely:

- I Where it can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and
- II That the proposed development is 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; and
- III That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features.

5.2 Sections 3 (Tourism - Overarching Planning Considerations) and 5 (Permanent Static Caravan, Chalet and Alternative Camping Sites) SPG Tourist Facilities and Accommodation (2021) give further guidance regarding the above criteria.

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

***Criterion I: - Where it can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality***

- 5.3 This criterion specifically refers to an intensification of new developments. In order to define 'intensification' in this context you should refer to the paragraph of explanation in 6.3.69 that refers to the 'Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within each Landscape Character Area (as defined by the Gwynedd Landscape Strategy (2012) the landscape's character is assessed to ascertain the capacity of the local landscape for further developments of holiday chalets or caravans.
- 5.4 This specific development falls within the G10 Landscape Character Area (Mid Llŷn). 5.4 The Landscape Sensitivity and Capacity Study notes the indicative capacity for the Landscape Character Area. Specifically in relation to the LCA relevant to this application it is noted: "Outside the AONBs and SLAs there may be very limited capacity for developments typically comprising of very infrequent to very small scale, sensitively sited, high quality developments, that should relate well to the existing built environment/urban landcover". The Study defines very small developments as those up to 10 units and small developments as those between 10 - 25 units. Therefore, appropriate consideration will need to be given to the scale of the proposed development in the location in question. In accordance with the Landscape and Sensitivity and Capacity Study the number of units (8 pods) proposed for this site are defined as a very small development.
- 5.5 In addition, there are 4 static caravan sites within 0.7 km to the site. However, there is no Permanent Alternative Camping Accommodation in the site's vicinity.
- 5.6 In the context of the above, and considering the size of the proposed site, it is not considered that the proposal would lead to an excess of such sites in the locality.
- 5.7 ***Criterion II: - 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 and/or where units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape***
- 5.8 Within the Plan, an unobtrusive location is described as being one which is well screened by existing landscape features 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.
- 5.9 Policy AMG3 states that proposals must demonstrate that they do not have a significant adverse impact upon features and qualities which are unique to the local landscape in terms of visual, historic, geological, ecological and cultural aspects. Furthermore, Policy PCYFF 4 states that all proposals should integrate into their surroundings. Proposals that have not given consideration to landscaping matters from the outset as part of the design proposal should be refused.
- 5.10 To this end, it is noted that the proposal site has already been sufficiently landscaped, however, it is considered that the essential work to provide an acceptable access to the site together with a bus stop will cause a development that would be unsuitable in the landscape bearing in mind the rural location and existing character. To this end, it is considered that the proposal is contrary to this criterion.



PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

5.11 ***Criterion III - That the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features***

5.12 The existing access to the site is unacceptable to serve the proposal and as a result it is proposed to make alterations to the access to provide acceptable visibility splays. In terms of highway matters, the Transportation Unit has confirmed that these visibility splays are acceptable for the proposal. It is noted that amended plans have been submitted that add a bus stop area on the western side of the access, together with moving the existing chevron to provide alterations to the access. Based on the Highway Unit's observations on this element, it is considered that the provision of a bus stop area here has the potential to cause a hazard to road users and pedestrians.

5.13 The waiting area is only on one side of the road and therefore anyone needing to catch a bus travelling towards Caernarfon would be forced to stand on the highway itself. The bus stop area would enable those who wish to catch a bus travelling in the Cricieth direction by standing at the appropriate place off the road, however, no place is provided to pull in. This means that a bus would slow down and stop not far from a corner and a bridge with narrow stone walls. Traffic behind the bus would be forced to wait behind the stopped bus, or overtake the bus on the other side of the road on a right hand corner travelling towards traffic without any visibility from either side.

5.14 The visibility of vehicles pulling out of the proposal's access would also be affected as the bus would stop on the public highway directly to the right of the access.

5.15 To this end, it is not considered that the proposal provides sufficient vehicular access without significantly harming the landscape's features and character and therefore the proposal is contrary to this criterion.

**Visual amenities**

5.16 As noted above, the application site is not within an area with special landscape designations. In addition, the mature trees surrounding the site shelter the site from the wider landscape. It is considered that the site itself is not obtrusive in the landscape and integrates well with its surroundings.

5.17 Notwithstanding this, as noted above, the alterations to the existing access together with providing a bus stop near the access will create more urban features that would be likely to have a significant visible and unacceptable impact on the character of this rural area. Therefore, it is considered that the proposal is contrary to the requirements of policies PCYFF 2 and 3.

**General and residential amenities**

5.18 Generally, policy PCYFF2 in the Joint LDP permits proposals for new developments as long as they have no unacceptable adverse impact on the health, safety or amenity of occupiers of local residences, the use of land or other properties or the area's characteristics due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution or other forms of pollution or nuisance.

5.19 The dwelling nearest to the site is approximately 180 metres away and there is no public footpath close to the site. Therefore, it is unlikely that the proposal would cause significant harm to the

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

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**

- 5.20 Policies TRA 2 and TRA 4 of the LDP involve assessing proposals in terms of their impact on road safety. The proposal involves modifying the existing agricultural access to improve and provide a bus stop and there would be one parking space available for each holiday pod. The Transportation Unit has no objection to the parking situation and therefore in terms of this aspect it is considered that the proposal conforms to the requirements of policy TRA 2.
- 5.21 As noted above, the proposal involves making alterations to the existing agricultural access to make it acceptable and the Transportation Unit has confirmed that the visibility splays shown are acceptable for the proposal. It is noted that amended plans have been submitted that add a bus waiting area on the western side of the access together with moving the existing chevron to provide alterations to the access. Based on the Highway Unit's observations on this element, it is considered that the provision of a bus waiting area here has the potential to cause a hazard to road users and pedestrians.
- 5.22 The waiting area is only on one side of the road and therefore anyone needing to catch a bus travelling towards Caernarfon would be forced to stand on the highway itself. The waiting area would enable those who wish to catch a bus in the Cricieth direction to do so by standing at the appropriate place off the road, however, no place is provided to pull in. This means that a bus would slow down and stop not far from a corner and a bridge with narrow stone walls. Traffic behind the bus would be forced to wait behind the stopped bus, or to overtake the bus on the other side of the road on a right hand corner travelling towards traffic without any visibility from either side.
- 5.23 The visibility of vehicles pulling out of the proposal's access would also be affected as the bus would stop on the public highway directly to the right of the access.
- 5.24 To this end, planning officers are not convinced that the proposal as a whole could provide sufficient or safe vehicular access for the proposal or for other highway users, and as already noted in the report, the visual impact of the changes to the access near the highway is unacceptable and assessed under the above 'principle of the development'. Therefore, the proposal is considered to be contrary to the requirements of policy TRA 4 of the LDP.

### **Trees and Biodiversity Matters**

- 5.25 An Ecological Assessment and Tree Survey have been submitted as part of the application. The response of the Biodiversity Unit has been received on these assessments and it confirms that there is no objection to the proposal as long as the mitigation measures noted are provided on the site. To this end, it is considered that the proposal complies with the requirements of policies PS 19, AMG 3, AMG 5 and AMG 6 of the LDP.

### **The Welsh Language**

- 5.26 Supplementary Planning Guidance (SPG) 'Maintaining and Creating Unique and Sustainable Communities' (adopted July 2019), provides further guidance on how it is expected for Welsh language considerations to be incorporated in each relevant development. The thresholds in terms of when it will be expected to submit a Statement/Report have been highlighted in Policy PS1 of

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

the Joint LDP, along with Diagram 5 of the SPG. The proposed development does not reach these thresholds.

5.27 Although no formal Statement/Report is required, consideration should be given to the Welsh language in accordance with the guidance in Appendix 5 of 'Maintaining and Creating Distinctive and Sustainable Communities SPG'. In relation to this, a Welsh Language Statement has been submitted by the applicant and notes the following points:

- Directional and internal signage will be bilingual.
- Information about attractions, facilities and local services will be provided within the site.
- It is proposed to raise awareness of the Welsh language (e.g. Information boards with key Welsh day-to-day sayings) encouraging holidaymakers to learn the language.
- Provision of local employment opportunities.

5.28 To this end, it is considered that the proposal conforms to the guidance included in section 'CH' of Appendix 5 in the SPG.

### **Sustainability**

5.29 Policy PS 5 (Sustainable Developments) supports developments which are consistent with sustainable development principles, and where appropriate, developments should:

*"Reduce the need to travel by private transport and encourage the opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport, in accordance with Strategic Policy 4" (Bullet point 12, Policy PS 5).*

This is supported by bullet point 4 of Policy PS 14 (The Visitor Economy).

5.30 It is considered that the policies of the LDP are consistent with local and national planning policies in terms of how it deals with sustainable development principles.

5.31 The majority of the holiday unit users would use a private car to get to the site and although it is recognised that there are public footpaths and cycle paths near by, the highway and footpaths network does not makes this a safe, attractive or likely option.

5.32 It is noted that the proposed bus stop is situated opposite the access to the site and the proposal provides a 'bus waiting area' near the site access. The above report confirms that locating the waiting area here is not acceptable in terms of the visual impact on the area or in terms of highway safety. In addition, it is noted that the nearest centre to the site that offers a limited range of services is Cricieth (approximately 3km away). Therefore, in the context of all the relevant material planning considerations, it is considered that the development is located on an unsustainable site, and the proposal is contrary to the requirements of policies PS4, PS5 and PS14 of the LDP together will complying with the advice included in TAN 18 and PPW.

## **6. Conclusions:**

6.1 Based on the above, it is not considered that the proposal can meet all the requirements of the relevant policies and would cause a significant and detrimental impact on the landscape and highway safety.

PLANNING COMMITTEE	DATE: 21/06/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

## 7. Recommendation:

### 7.1 To refuse – reasons

1. The alterations to the existing access in order to create an acceptable access to the site (in terms of highway safety) have an unacceptable detrimental effect on the rural character and visual amenities of the area which is contrary to the requirements of criteria ii and iii of policy TWR 3, AMG 3 and PCYFF 2 and 4 of the Gwynedd and Anglesey Joint Local Development Plan 2017 which protects amenities and visual impact on the local landscape.
2. The provision of a bus stop near the existing access which is to be improved is likely to have a detrimental effect on road safety contrary to the requirements of policy TRA 4 of the Gwynedd and Anglesey Joint Local Development Plan 2017 which ensures road safety.
3. The site is located in a rural location and approximately 3km to the nearest serviced town / village and the nearest bus stop. The local road and footpath network is not convenient to use from the site and the proposed bus stop that forms part of the application is unsuitable. Due to the rural location of the proposal, visitors would be very likely to use their own transport to travel to the site and attractions / shopping / services during their stay, and therefore the site is not accessible and located to reduce the need to travel by private transport. On this basis, it is considered that the proposal is contrary to the requirements of policy PS4, PS14, criterion 12 of policy PS5 of the Gwynedd and Anglesey Joint Local Development Plan 2011-2026, Technical Advice Note 18 Transport and Planning Policy Wales Issue 11.