

Number: 4

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 sited 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.
- 1.6 A decision on this application was deferred at the Committee meeting on 24 September 2020 in order to give the applicant an opportunity to submit further information to support her application. Additional correspondence was received from the applicant making the following points:
- It is proposed to undertake landscaping work by planting hedgerows of *Crystallinia* plants (similar to the hedgerows that grow near the access from the main road.)
 - The caravans will be sited one and a half metres down in the land, and 4 metres from the fence into the field, in order that they are not close to the existing site.
 - The new road will be 50m long and similar to the existing road.
 - As some awnings are larger than the standard, it is proposed to place an additional one metre between the caravans.
 - Parking is not allowed by the side of the caravans, only in front
 - The existing toilet and shower building is sufficient.
 - The pandemic has caused an increase in use by Welsh visitors from the North and South and this development will assist to meet the demand from people from Wales.

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- Adding to the caravan site will assist to ensure a future for the next generations at Plas yng Ngheidio.
- The development would give an opportunity for local young people to work in their area.

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**

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

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

PS 19 - Conserving and where appropriate enhancing the natural environment

AMG 2 – Special Landscape Areas

AMG 5 - Local biodiversity conservation

PS 20 - Conserving and where appropriate enhancing cultural assets

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

Supplementary Planning Guidance - Maintaining and Creating Distinctive and Sustainable Communities

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 18 – Transport

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3. Relevant Planning History:

C19/0903/33/LL - Application to amend condition 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 new 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

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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 arrangement 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 reduced 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 has been well hidden by the existing features of the landscape and, considering all the proposed excavation and re-levelling of 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).
- 5.4 The field in question varies in terms of land 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 highest 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 integrate into their surroundings, and those that fail to show how landscaping has been considered from the outset as part of the design proposal will be refused. 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 create 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 disseminate 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 therefore 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 site, namely a bungalow known as Tŷ Ni which is in 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 operates 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. 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 waste 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 the capacity is 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.

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Linguistic matters

- 5.12 It is noted that there are some specific types of developments where it will be required for the proposal to submit a Welsh Language Statement or a Welsh Language Impact Assessment. The thresholds in terms of when it will be expected to submit a Statement/Report have been highlighted in Policy PS1 of the Joint LDP, along with Diagram 5 of the SPG Maintaining and Creating Distinctive and Sustainable Communities (SPG). The development in question does not meet one of the thresholds in Policy PS 1 of the LDP.
- 5.13 Excluding the developments that meet the thresholds for submitting a Welsh Language Impact Statement / Assessment noted in Policy PS1, guidance is provided in terms of the type of relevant applications where it is necessary to give consideration to the Welsh language in Appendix 5 (The Screening Procedure) of the SPG (sections Ch to Dd). The guidance included within Appendix 5 notes that every retail, commercial or industrial development where there is no need to submit a Welsh Language Impact Statement / Assessment should show how consideration has been given to the language. Therefore, it is deemed appropriate to receive further information from the applicant in terms of how consideration has been given to the Welsh language when drawing up the proposal. Methods to submit the information could include a Planning Statement, a Design and Access Statement, a Welsh Language Statement or a Welsh Language Impact Assessment report. However, as the proposal is contrary to fundamental policies within the LDP that cannot be met, the applicant was not requested to submit information on how they considered the language as part of the application in order to avoid additional costs for 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.
- 6.2 In acknowledging the points made by the applicant in the submitted additional information, these do not change the fact that the site would be visible in the landscape and the extension in question would be 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.

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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, improving or restoring the recognised character of the Special Landscape Area and the proposal is therefore contrary to the requirements of Policies PCYFF 4 and AMG 2 of the Anglesey and Gwynedd Joint Local Development Plan.