

PLANNING COMMITTEE	DATE: 12/07/2021
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

Number: 6

Application Number: C20/0877/09/LL

Date Registered: 26/10/2020

Application Type: Full

Community: Tywyn

Ward: Tywyn

Proposal: Siting of 9 static holiday caravans in lieu of 12 touring caravans together with environmental improvements

Location: Pall Mall Caravan Park, Ffordd Brynecrug, Tywyn, Gwynedd, LL36 9RU

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 The proposal involves extending an existing caravan site in order to site nine static caravans in lieu of 12 touring caravans that have an extant planning permission on the existing caravan site. The proposal would involve creating an access road, parking spaces and a concrete plinth base. It is noted in the Planning, Design and Access Statement that it is intended to plant more indigenous trees and hedgerows within the site but no details of this landscaping were submitted. The Planning, Design and Access Statement also notes the intention for these proposed static caravans to be clad in an environmental green colour in accordance with the appearance of the existing caravan site. It is understood that the proposed static caravans would be occupied between 1 March in any year and 7 January in the following year, which is the same as the existing static caravans.
- 1.2 The application site is located outside the development boundary of the existing caravan site. There is planning permission for 46 static caravans and 40 touring caravans on land directly to the south-east of the application site. There is also planning permission to site 28 touring caravans between Easter and 31 October and to store touring caravans over the winter months between 1 November and Easter on a field further towards the south-east of the application site. Pall Mall also has planning permission for two chalets.
- 1.3 As part of the application, a Planning, Design and Access Statement and a Flood Consequence Assessment was submitted. From the Planning, Design and Access Statement, it is understood that the application is submitted as there is a lack of space on occasions to site the 40 touring caravans that have permission under planning permission 5/79/64G. This is in light of the fact that modern touring caravans are larger than they have been historically. Therefore, reducing the number of touring caravans on the site from 40 to 28 would allow for a more spacious site for the touring caravans. In addition, it is understood that younger members of the family are undertaking tourism business studies with a view to take over the business in the future and the proposal in question would ensure that the site is sustainable in economic terms and secure the future of the business for the next generation.
- 1.4 The site lies in the countryside on even land, which is located off the class I county road of the A493 when approaching Tywyn from the direction of Brynchrug. The site is within the Dysynni Valley Landscape of Outstanding Historic Interest. The boundary of Snowdonia National Park lies approximately 240 metres to the north-east of the site. The site lies within a C1 flood zone. There are some residential dwellings in the vicinity of the site.
- 1.5 The application is submitted to Committee at the Local Member's request.

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.

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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 1 - The Welsh Language and Culture

PS 2 - Infrastructure and developer contributions

ISA 1 - Infrastructure provision

TRA 2 – Parking standards

TRA 4 – Managing transport impacts

PS 5 – Sustainable developments

PS 6 – Mitigating the effects of climate change and adapting to them

PCYFF 1 – Development Boundaries

PCYFF 2 – Development criteria

PCYFF 3 – Design and place shaping

PCYFF 4 - Design and landscaping

PS 14 – The visitor economy

TWR 3 - Static caravan and chalet sites and permanent alternative camping accommodation

PS 19 - Conserving and where appropriate enhancing the natural environment

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.

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Technical Advice Note 13 – Tourism

Technical Advice Note 15: Development and Flood Risk.

Technical Advice Note 18 – Transport

3. Relevant Planning History:

- 3.1 There is no specific planning history for the application site but the planning history of the existing caravan site is relevant to the application in question, especially the applications below in terms of what is the existing permission in terms of numbers and type of units with permission.
- 3.2 C18/0005/09/TC - Lawful Development Certificate for use of land as a touring caravan site for 28 touring caravans between Easter and 31 October in any year, together with the storage of touring caravans in the winter months between 1 November and Easter - Approved 27 February 2018.
- 3.3 C96M/0089/09/CL - Increase the number of static caravans from 35 to 46 - Refused 11 November 1996. The application was later approved on appeal on 29 May 1997.
- 3.4 5/79/64G - Change the use of a touring caravan site to 40 touring caravans and 35 static caravans - Approved 19 November 1993.
- 3.5 Tyw.U 1606 – 2 chalets – Approved 1970.
- 3.6 In April this year, application number C21/0180/09/LL was approved to erect a new amenity building to contain laundry and reception area.

4. Consultations:

Community/Town Council: Not received.

Transportation Unit: No recommendation as it is not considered that the proposal would have a detrimental impact on any road or proposed road.

Natural Resources Wales: We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirements are met. Otherwise, we would object to this planning application:

Requirement 1 - The applicant revises the FCA to demonstrate that the proposed development complies with TAN15.

Requirement 2 - The applicant submits a proposed landscape plan showing existing trees and hedgerows to be retained and proposed new native planting.

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Flood Risk

We have reviewed the Flood Consequences Assessment (FCA) (Waterco, Pall Mall Caravan Park, Tywyn dated March 2020).

Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level as the site would flood to significant depths in the design event as per Section A1.14 of TAN 15.

The FCA states that “The topographical survey shows that the site generally slopes from 2.56m Above Ordnance Datum in the south to 1.52m AOD in the north-west.” It also states “The site is identified at risk of tidal flooding with a maximum flood level of 5.13m AOD during the 0.5% AEP plus 100 years CC event. Flood depths vary between 2.57m in the higher southern extent of the site and 3.61m in the lower north-western extent of the site. Flood depths in the location of the 9 no. new units are 1.5m – 2.5m higher than in the location of the 12 no. units to be removed”.

The Design and Access Statement, section 10.6 advises that “the applicant has explored the option of raising ground levels on the application site to the same level as the touring area where we propose to remove pitches.” However, no further information on this, or any possible third-party impact assessment has been submitted. However, before undertaking any further work, it may be unlikely that the proposed development would be able to comply with TAN 15. If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we object to this application.

Requirement 1 - The applicant revises the FCA to demonstrate that the proposed development complies with TAN 15.

Please inform us, in accordance with paragraph 11.7 of TAN 15, if you are minded to grant permission for the application contrary to our advice.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited

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to delivering flood warnings to occupants/users.

Landscape

The site is located 240 metres from the Snowdonia National Park.

The site is potentially visible from higher ground within the Snowdonia National Park. There will be open views from the south-east and north-east and north-west. There may be a potential impact on the setting and views from the Snowdonia National Park.

As advised within section 6.4 of the Planning, Design and Access Statement, Savills UK, October 2020, the development proposes further native tree and hedgerow planting within the site to mitigate any wider landscape impact. However, no plan has been submitted showing the trees and hedgerows to be retained and proposed new native planting. We recommend that photos of the site from nearby higher ground would assist in our assessment of the impact of the proposed development on the Snowdonia National Park.

Requirement 2 - The applicant submits a proposed landscape plan showing existing trees and hedgerows to be retained and proposed new native planting.

In addition to the above plan, we request that the applicant provides further details of the exact colour and material of the proposed caravan units. We recommend dark coloured roofs for the units.

Welsh Water: Recommend a condition to introduce and agree on details to dispose of foul water from the site.

Public Protection Unit: Not received.

Biodiversity Unit: There is a hedgerow between the existing caravan park and the proposed extension to it. This hedge is likely to be a habitat of high Biodiversity value and I recommend that plans show that it is retained and enhanced by widening and planting with native tree species (hazel, holly, willow, honeysuckle, alder etc.).

The field appears to be a grassland that is agriculturally improved and therefore of low biodiversity value.

It is within a flood zone.

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I have no objection to the siting of caravans in this field, if the existing hedgerow is retained and enhanced and if other biodiversity enhancements are created such as the management of the remaining field as a wild flower meadow.

I recommend that the application provides amended plans to show the retained hedge and a plan for the management of a wild flower meadow.

Cadw:

Advice

Having carefully considered the information provided with this planning application we have no objections to the proposed development. Our assessment of the application is given below.

Assessment

ME088 Croes Faen Standing Stone

The application is located some 375m west-south-west of scheduled monument ME088 Croes Faen Standing Stone. The monument comprises the remains of a standing stone, which may date to the Bronze Age or may be the remnants of an early medieval or medieval cross-shaft. Situated in a low-lying position close to the main A493, it is a little over 2m high with a diameter of approximately 0.75m. Its surface comprises six facets of varying width, which could be either cut or natural. The top is flat and there is no trace of a socket.

If the stone is Bronze Age it would have been located so that it had views to and from neighbouring funerary monuments, prominent natural features and associated settlement sites and these are most likely to have been positioned along the river Dysynni and its estuary. In this case the significant views from the scheduled monument would be to the north-west in an arc from south-west to north-east. If the stone is an early medieval or medieval one, it probably marks a grave or the road junction or possibly had a joint function. In this case the significant views would be north-east and south-west along the route of the current A483 and south along the current by-road.

The proposed development will see the number of touring caravans that are allowed to pitch inside the existing caravan park reduced by 12 and 9 static caravans located to the north-west of the existing caravan park. The additional caravans will be located in the identified significant views from the Croes Faen Standing Stone (if it is of Bronze Age) but will be partly screened by existing hedges and seen with tall trees behind them. They will also be viewed in association with the existing caravan park. As such whilst there may be a very slight visual change in the view from the monument this

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will not have any effect on the way that it is experienced, understood and appreciated. Consequently the proposed development will have no impact on the setting of scheduled monument ME088.

Licensing Enforcement Officer: Observations are submitted on the application as follows:

Licence Condition Requirements

This development will be subject to the Legislation stated below relating to Health and Safety, Fire Safety and Public Health provision as follows:

1. Caravan Sites and Control of Development Act 1960
2. Public Health Act 1936
3. Model Standards 1989 - The development must fully comply with licence conditions.
4. Model Standards 1983 - The development must fully comply with licence conditions.
5. Application for a Site Licence - Any changes in planning conditions may require the applicant to make an application to amend the site licence.
6. Planning Permission / Lawful Use Certificate - The records of the Pollution Control and Licensing Service show that no application to amend the site licence has been received following the Lawful Use certificate.
7. Flood Area - A licence condition specifies that sites prone to flooding, "warning notices should be displayed giving guidance on the flood warning system". However, where Natural Resources Wales comments that the application should be refused because the development is located in a flood zone, then their comments will take the lead.

Drainage Unit:

Flood Risk and Land Drainage

A FCA has been presented with the application as the development is located within a C1 flood zone. We shall allow NRW to comment upon the content of this report, including the measures proposed to

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manage flood risk.

SuDS Approval Body Comments

Since 7 January 2019, sustainable drainage systems (SuDS) are required to control surface water for every new development of more than one dwelling or where the building surface area has drainage implications of 100m² or more. Drainage systems must be designed and constructed in accordance with the minimum standards for sustainable drainage as published by Welsh Ministers.

These systems must be approved by Gwynedd Council in its role as SuDS Approval Body (SAB) prior to commencement of the construction work.

Due to the size and nature of the development, it is likely that an application will need to be provided to the SuDS Approval Body for approval before construction work commences. No drainage materials have been submitted to date, and until an application is made to the SuDS Approval Body, there is no assurance that the site plan would enable compliance with the full suite of the national SDS standards.

Snowdonia National Park: Not received.

Fire Service: The Fire Authority has no observations regarding the access for Fire vehicles and water supply.

Public Consultation: A notice was posted on the site and nearby residents were notified. The advertisement period has expired and no response was received.

5. Assessment of the material planning considerations:

The principle of the development

5.1 The site lies within a C1 flood zone as identified and associated with Technical Advice Note 15: Development and Flood Risk (TAN 15). The proposal is very vulnerable to damage and TAN 15 in section 6.2 states that locating such a development within a C1 zone should only be justified if it can be demonstrated that:

- i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement or

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- ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region.

Also,

- iii. It concurs with the aims of Planning Policy Wales and meets the definition of previously developed land and,
 - iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and Appendix 1 found to be acceptable.
- 5.2 It is recognised that the proposal has been submitted for the benefit of the economic sustainability of the business and to safeguard it for the next generation of the family. However, the proposal in question is not part of a local authority regeneration initiative or strategy required to sustain an existing settlement in accordance with point i above. It does not contribute to key employment objectives either that are supported by the local authority, and other key partners, to sustain an existing settlement or region in terms of point ii above.
- 5.3 It is intended to site the 9 proposed static holiday units on a piece of land that is located outside the boundary of the existing caravan site. As part of the Planning, Design and Access Statement submitted as part of the application, the applicant states that this site is used as amenity land that is associated with the caravan site. It is also noted that it is used by exempt organisations for camping. However, for Planning purposes, the piece of land that is the subject of the current application is agricultural land that has already been developed. Although the land is used by exempt organisations, this is not tantamount to changing the land use and it would not lead to the land being previously developed land. It is also noted that the Flood Consequence Assessment refers to the land as undeveloped land. Therefore, it is considered that the proposal fails to comply with point iii above as it does not meet the definition of previously developed land as defined in Planning Policy Wales. As explained, there is no planning permission for camping on the land and no legal use has been established and even if the land forms part of amenity land for the permitted site, this would not mean that it is in keeping with the definition of previously developed land.
- 5.4 In terms of point iv above, a Flood Consequence Assessment was submitted as part of the application. Natural Resources Wales were consulted in terms of the Flood Consequence Assessment and they have stated that the Flood Consequence Assessment fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level as the site would flood to significant depths in the design event as per Section A1.14 of TAN 15. Within the Flood Consequence Assessment, it is noted that a topographical survey of the site shows that it generally slopes from 2.56m AOD in the south to 1.52m AOD in the north-west. The Flood Consequence Assessment also states that the site has a risk of tidal flooding with a maximum flood level of 5.13m AOD during a 0.5% AEP plus 100 years event. Flood depths vary between 2.57m in the higher southern extent of the site and 3.61m in the lower north-western extent of the site. Flood depths in the location of the 9 new units would be about 1.5m to 2.5m higher than in the location of the 12 units to be removed. The Design and Access Statement, section 10.6 advises that the applicant has explored the option of raising ground levels on the application site

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to the same level as the touring area where they propose to remove pitches. However, there is no further information on this, or any possible third-party / alternative land impact assessment has been submitted. If no further information is submitted, or a revised Flood Consequence Assessment fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then Natural Resources Wales objects to the application.

5.5 In the conclusions section of the Flood Consequence Assessment, the report itself concludes that the proposal does not comply with TAN 15. However, should the local planning authority be minded to permit the development, contrary to the requirements of TAN 15, the document refers to the fact that the following flood mitigation measures could be implemented:

- Set floor levels of all units as high as practical.
- Anchor all units to the ground.
- Operate a flood warning and evacuation protocol, whereby the units are not occupied when a flood warning is in place.

Furthermore, the FCA advises that any replacement units should be sited on land no lower than the units which are to be replaced and that any new units (additional to the number of units permitted at the existing caravan park) should be sited on land that is at least 5.37m AOD.

5.6 Work to raise the ground level would require planning permission and details of this engineering work should form part of the planning application supported by levels and cross-sections. This type of work would also need to be supported with sufficient information to show that the proposal would not create / exacerbate flooding in other areas of the flood plain. The applicant is aware of this and the observations of Natural Resources Wales but no further information on flooding matters has been received. Therefore, it is considered that the proposal does not meet the requirements of point iv of TAN 15 as noted above.

5.7 Having assessed the proposal in the context of the 4 points above from paragraph 6.2 of TAN 15, it can be seen that the proposal does not meet any of the points and, therefore, it is considered that the proposal is contrary to the requirements of TAN 15 and the flooding matters included in policy PS 6.

5.8 The application seeks to site 9 static holiday caravans in lieu of 12 touring caravans and to propose environmental improvements. However, as land use considerations regarding touring caravans are different to considerations relating to static holiday caravan sites, the LDP does not contain a specific policy that deals with a proposal of this nature. Consequently, it is considered that the application must be dealt with as an application to extend and increase the number of static units in accordance with the requirements of Policy TWR 3 of the LDP that relate to static caravan and chalet sites and permanent alternative camping accommodation. The relevant part of the policy in terms of this specific application located outside the Llŷn and Anglesey AONB and outside the Special Landscape Area is part 4. This may permit small extensions to the site's surface, re-locating units from prominent locations to less prominent locations and / or a small increase in the number of units on the site, subject to compliance with all the criteria listed below:

- iv. *That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;*
- v. *That the proposed development offers substantial and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape.*

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- v. *In terms of sites located within the Coastal Change Management Area, the proposed development is part of a wider plan to improve the safety of the residents of the caravans or chalets;*
- vii. *That any increase in the number of static caravan holiday units or chalets is minor and is commensurate with the scale of any improvements to the site;*
- viii. *That it is appropriate in the context of other policies in the Plan.*

5.9 As already noted, there is no specific policy in the LDP relating to the replacement of touring caravan pitches with static caravan pitches. Therefore, the application must be considered as a proposal to increase the number of static holiday caravans and to extend the existing caravan site. Policy TWR 3 does not define small in terms of an increase in surface area but in terms of an increase in numbers as a general rule, it is noted that a rough increase of 10% above the number of units that existed when the original application was made is considered as minor. The proposal is requesting 9 new static holiday caravans that would give a total of 55 static units for the caravan site. This increase in itself is an increase of about 19.5% of the existing 46 but it must also be borne in mind that the explanation to the policy refers to a 10% increase above the number of units that existed when the original application was made. When application number C96M/0089/09/CL was approved in 1997, permission was granted to increase the number of static caravans from 35 to 46, which was an increase of about 31%. The proposal in question would increase the number of static caravans on the site from the original 35 to 55 and this is an increase of about 57%, which is way beyond the 10% referred to in Policy TWR 3 of the LDP. It is therefore considered that the proposal is contrary to point 4 iii of Policy TWR 3 as the proposal would not involve a small increase in the number of units on the site.

5.10 It is understood from the Planning, Design and Access Statement that the proposed units would be of single unit static caravans but this does not appear to be different or to improve the type of accommodation offered on the existing site. No other improvements in terms of the accommodation or facilities on the site have been proposed as part of the application. Despite reducing the density of touring caravans on the existing site, the proposal has not shown any significant and permanent improvements to the site. The extended area would also intrude to an area that has only been screened to the east / south-east, which would, therefore, make the site more prominent in the landscape and in extended views of the Snowdonia National Park. It should be noted that observations expressing concern regarding the visual impact of the proposal on the landscape have also been received from Natural Resources Wales. The application has noted that the proposal would include additional indigenous landscaping but no details on this have been received. The agent has noted that it would be possible to impose a landscaping condition. However, Policy TWR 3 and Policy PCYFF 2 requires the submission of landscaping details as part of a planning application. In addition to this, visual / landscape implications of the proposal also arise from the flooding matters with a possibility of raising ground levels and / or raising the level where the caravans would be sited above the ground. As already noted, no details or plans have been submitted as part of this and, therefore, the impact of the proposal in terms of its setting in the wider landscape cannot be assessed in full.

5.11 Therefore, in light of the above, it is not considered that the increase of 9 static holiday caravans or the site extension is small, and it is not commensurate with the scale of the improvements proposed in this case. The proposal is, therefore, considered contrary to the requirements of section 4 of Policy TWR 3 of the LDP.

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Visual amenities

- 5.12 Policy PCYFF 4 notes that all proposals should integrate with their surroundings. Proposals that fail to show (in a manner appropriate to the nature, scale and location of the proposed development) how landscaping has been considered from the outset as part of the design proposal will be refused. Despite reducing the density of touring caravans on the existing site, the proposal has not shown any significant and permanent improvements to the site or its location in the landscape. The extended area would intrude to an area that has only been screened to the east / south-east, which would, therefore, make the site more prominent in the landscape and in extended views of the Snowdonia National Park. It should be noted that observations expressing concern regarding the visual impact of the proposal on the landscape have also been received from Natural Resources Wales. The application has noted that the proposal would include additional indigenous landscaping but no details on this have been received. The agent has noted that it would be possible to impose a landscaping condition. In addition, flooding matters in terms of potentially raising the ground level and / or site the caravans on a higher level from the ground would also affect the visual impact of the proposal. Therefore, no detailed landscaping plan has been included as part of the application. Although the Design and Access Statement refers to additional planting, no landscaping plan has been submitted as part of the planning application and, therefore, it is not considered that the information provided as part of the application is sufficient to meet the requirements of policy PCYFF 4. To this end, it is considered that the proposal does not satisfy the requirements of policy PCYFF 4 of the LDP.

General and residential amenities

- 5.13 The proposal would increase the number of units on the caravan site. However, considering the location of the proposed units and the requested numbers, it is not considered that this would cause significant harm to the amenities of the local neighbourhood given that the proposal involves increasing the numbers on an existing touring and static caravan site. Therefore, the proposal is considered to be acceptable with regard to the local neighbourhood amenities aspect of Policy PCYFF 2 of the LDP.

Transport and access matters

- 5.14 It is proposed that the existing entrance to the site be used for the development. The Transportation Unit submitted observations on the proposal and there is no objection to the proposal. Although the proposal would involve 9 new static holiday caravans, it would also replace 12 touring caravan pitches and, therefore, by examining the development in its entirety it is not considered that the proposal would have a detrimental impact on road safety. The proposal includes parking spaces near the proposed static holiday caravans. It is considered that the proposal is acceptable in terms of road safety and complies with Policy TRA 2 and TRA 4 of the LDP.

Biodiversity matters

- 5.15 Observations received from the Biodiversity Unit state that the site is grassland that is agriculturally improved and therefore of low biodiversity value. The Biodiversity Unit had no objection to the siting of caravans in the field, if the existing hedgerow was retained and enhanced and if other biodiversity enhancements were created such as the management of the remaining field as a wild flower meadow. No detailed plans had been submitted to show which hedgerows would be retained or to show the additional biodiversity enhancements that would be created as a

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result of the proposal. Although additional planting was mentioned, no details have been submitted. Although these details have not been received, no protected species was identified on the land and, therefore, it is not considered that the proposal is contrary to Policy AMG 5 of the LDP.

Linguistic matters

- 5.16 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 any of the thresholds in Policy PS 1 of the LDP.
- 5.17 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. As the proposal is contrary to fundamental policies within the LDP and national policy that would not be possible to meet, 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 The proposal is very vulnerable to harm and is located within a C1 flood zone. However, the proposal does not meet the justification requirements in paragraph 6.2 of TAN 15 and, as a result, it does not meet the requirements of Policy PS 6 of the LDP either. The increase of 9 caravans and a site extension are considered to be unacceptable as the number of units proposed is not a minor increase, and is not commensurate with the scale of the improvements proposed to the site. Insufficient consideration was given to landscaping matters as part of the proposal and, as a result, it is not considered that the proposal would add to the maintenance or enhancement of the landscape and it would be contrary to the requirements of Policy PCYFF 4 of the LDP.

7. Recommendation:

7.1 To refuse – reasons

1. The proposal is very vulnerable to harm and is located within a C1 flood zone. The proposal is not part of a regeneration strategy or strategy by the local authority and neither does it contribute to key employment objectives that are supported by the local authority and other key partners. The proposal is not located on previously developed land either and the Flood Consequence Assessment submitted with the application fails to show that risks and flood consequences can be managed to an acceptable level. Therefore, the proposal does not meet the justification

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requirements included in paragraph 6.2 of Technical Advice Note Wales: Development and Flood Risk and, as a result, it is also contrary to the requirements of Policy PS 6 of the Gwynedd and Anglesey Joint Local Development Plan.

2. The increase in the proposed number of static holiday caravans is not small, or commensurate with the scale of the proposed improvements for the site and it is above the recommended increase of 10% in the original numbers on the site, therefore, it is contrary to the principles of point 4 of policy TWR 3 of the Anglesey and Gwynedd Joint Local Development Plan and Supplementary Planning Guidance: Tourist Facilities and Accommodation.
3. Insufficient consideration was given to landscaping matters as part of the proposal. In light of this, it is not considered that the proposal would add towards maintaining or enhancing the landscape and that the proposal is contrary to the requirements of Policy PCYFF 4 of the Anglesey and Gwynedd Joint Local Development Plan.