

<b>PLANNING COMMITTEE</b>	<b>DATE: 01/03/2021</b>
<b>REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER</b>	

**Number: 3**

**Application Number: C19/0746/46/LL**

**Date Registered: 27/08/2019**

**Application Type: Full**

**Community: Tudweiliog**

**Ward: Tudweiliog**

**Proposal: Provision of 10 touring caravans and 4 tents**

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

**Summary of the Recommendation: TO REFUSE**

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## 1. Description:

- 1.1 This application involves the provision of ten seasonal touring caravans and four tents on the site of an existing Camping and Caravanning Club touring camp site (for five caravans or motorhomes and up to ten tents). 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 1.3 miles 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. It appears that the nearest bus stop is approximately 1.3 miles from the application site.
- 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

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

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PS 14: The visitors 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 is:

Supplementary Planning Guidance: Tourist Facilities and Accommodation

#### 2.4 **National Policies:**

Planning Policy Wales (Edition 10 - December 2018)

Technical Advice Note 13: Tourism

Technical Advice Note: Transportation

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

3.1 This site does not appear to have any specific planning history.

### 4. **Consultations:**

Community/Town Council: No observations

Transportation Unit: No objection

Natural Resources Wales: No observations

Welsh Water: Not received

Public Protection Unit/Licensing: 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.

Rights of Way Unit: Not received

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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 and tents, 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.
- 5.3 Concern was stated by the Licensing Unit as it is not clear from the plans whether the distance between the touring caravans is 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. However the necessary information has not been received, and therefore the layout of the site as shown is not considered to be acceptable.
- 5.4 It is accepted, due to the existing vegetation, that this development would be well hidden in the landscape. However, this does not override the fundamental objection to a development of this scale in this location for the reasons reported below.
- 5.5 For these reasons it is not considered that the application includes sufficient information to demonstrate that it meets the requirements of policies TWR 5, PCYFF 3 and 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 1.3 miles 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, as already noted, it is not considered that the site in question is sustainable, and it cannot be easily reached through various methods including walking, cycling and public transport, which minimises the need to travel by private transport. The application site is therefore in a remote, rural location, and a significant distance from the nearest village which has shops and service provisions. As a result of the proposed development's rural location, tourists are likely to use their own transport to travel to the

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site. Any users who wish to use the bus stop would firstly have to walk there, and then wait for a bus, before travelling to their destination. Therefore, it is very likely that users of the units would use private transport to travel each day. Due to the distances and the country roads, only some journeys are likely to be made on foot or on a bike. Therefore, by failing to reduce the need to travel with private transportation, the proposal fails to meet the requirements of Policy PS 5 and the requirements of Planning Policy Wales which promotes sustainable developments. It is therefore considered that the proposal is contrary to criterion 12 of Policy PS 5 as the proposal would not reduce the need to travel with private transportation.

- 5.9 Paragraph 6.3.79 of the LDP further explains that the aim of Policy TWR5 is to facilitate the establishment of high quality touring and camping sites in suitable locations. The application site is located at a considerable distance from the closest villages that have basic services and facilities, and public transportation provision. Given the noted distances, the topography, the narrow width of the road, the lack of footpaths and the limited visibility along parts of the nearby road, it is unlikely that many journeys will be made on foot or by bike, thus creating a dependency on the use of private transport. Although 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 It is acknowledged that the site is currently used as a campsite for five caravans and up to ten tents. Evidently, the current proposal to have ten touring caravans would not lead to an increase in the number of vehicles visiting the site towing caravans. Although information was requested about the annual number of visitors, no confirmation has yet been received. This would have been a method of establishing a baseline number for the visitor numbers to the site over a period of time. This figure could then be compared with the projected numbers in order to try to establish the movements in and out of the site. If this location was served by a road of a higher standard, it is likely that there would be less concern, but without being able to assess the projected numbers in relation to the increased use of the existing narrow and winding road (or no increase if this was known), it is impossible to fully assess the impact.
- 5.11 As the application site is in open countryside, away from local infrastructure and access to facilities/services and the dependency on private transport, and that there is a lack of information to be able to fully assess the proposal, it is not considered that the site is close to the main roads network as required by criterion 5 of policy TWR 5, nor is it a sustainable location as referred to in criterion 4 of policy PS 14, and therefore it does not comply.

### **Planning History**

- 5.12 As noted above, it is 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 fall-back 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. By confirming the difference in numbers it would then be possible to consider the "fall-back", namely whether there is a real difference between the number of visitors to the site historically, and the likely future numbers. If this was confirmed, it is possible that it would have shown a negligible difference or even a decrease in the numbers (especially given that no specific numbers have been noted for the tents in the Caravanning Club licence) and therefore it would have been possible to examine what the true change would be. But as this information has not been submitted, it is impossible to establish what the difference would be between the historical use and the proposed use of the site and, consequently, how this would affect the number of movements on the narrow roads network towards the site.

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- 5.13 Consequently, it is not believed that the proposal would be a sustainable development, and would not comply 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 PS1.
- 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, and based on a full assessment of the relevant requirements, it is not believed that the scale of the proposal is entirely contrary to the specific categories as outlined within the SPG screening arrangements. However, if the application was acceptable 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. Due to the fundamental concerns about other elements of the development, including its location, officers have not asked the applicant to submit information in response to the relevant requirements in relation to bilingual signage in this case as noted in the SPG.

## **6. Conclusions:**

- 6.1 Although some elements of the proposal are acceptable, having assessed and weighed-up the development as a whole against the requirements of all relevant policies, we come to the conclusion that the site's unsustainable location and its distance from the main roads network is contrary to policy. It is also noted that the form and positioning of the units on the site as shown means that the proposal's layout is not totally acceptable as there is inadequate space between the individual plots, meaning that it is not an acceptable development, and is contrary to 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. There is, therefore, no option but to refuse the application.
- 6.2 Although the site is currently used for touring caravans and tents, officers have not been persuaded that this proposal in its current form complies with the principles of policy TWR 5 that relates to touring caravan, camping and temporary alternative camping accommodation. Although it is not considered that caravans and tents in this location would be an intrusive feature in the landscape, given the lack of additional information in order to fully assess all the relevant considerations, officers are not persuaded that it would be entirely with the requirements of the adopted policies as noted above. Having considered all the relevant planning matters including the local and national policies and guidance as well as the observations received, it is believed that the proposal is contrary to a number of policies, and therefore, there is no option but to refuse the application.

## **7. Recommendation:**

- 7.1 To refuse – reasons
1. The proposal involves the creation of a new touring caravan and camping site in open countryside, far from the main roads network. In addition, it is not considered that the proposal makes use of a suitable site in the countryside as it is an unsustainable site where the majority of

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the visitors would be dependent on private vehicle use. Therefore, the proposal does not comply with the requirements of criterion 5 of policy TWR5, in addition to the relevant requirements of policies PS4, PS5 and PS14 of the Anglesey and Gwynedd Joint Local Development Plan 2017, and the advice contained in Supplementary Planning Guidance: Tourist Facilities and Accommodation 2019 and Planning Policy Wales, Edition 10, 2018.

2. The proposal is contrary to criterion 1 of policy TWR 5 and the general requirements of policies PCYFF 3 and PCYFF 4 of the Gwynedd and Anglesey Joint Local Development Plan, 2017, on the grounds that it is not believed that the location of the units within the site is of a high quality due to the lack of acceptable space between the position of the individual units.