

PLANNING COMMITTEE	DATE: 13/12/2021
SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER'S REPORT	

Number: 10

Application Number: C21/0768/42/LL

Date Registered: 06/08/2021

Application Type: Full

Community: Nefyn

Ward: Nefyn

Proposal: Extension of caravan park to adjoining field with the addition of 8 Static Caravan Plots, increasing the total number of pitches from 17 Static Caravans to 25.

Location: Tyn Y Cae Caravan Park Tai Lôn, Nefyn, Pwllheli, Gwynedd, LL53 6LL

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This application seeks to extend an existing static caravan park by placing an additional 8 caravans in an adjacent agricultural field, increasing the number of static caravans on the site from 17 to 25. The proposal also seeks to extend the site's internal road into the field with fire extinguisher points located every 30m through the site.
- 1.2 The site is located adjacent to a class 2 road, the B4417, in the countryside to the north west of the development boundary of Nefyn Local Service Centre as defined by the Anglesey and Gwynedd Joint Local Development Plan. Public footpath No 2 – Nefyn Community, runs along the southern boundary of the site. The site lies outside, but within 10m, of the boundary of the Llŷn Area of Outstanding Natural Beauty and within the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest. Aberavon Holiday Park is located directly opposite the site, within the AONB.

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 (Wales) Act 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. (July 2017)

TWR 3: STATIC CARAVAN, CHALET AND PERMANENT ALTERNATIVE CAMPING ACCOMMODATION SITES

PCYFF 2: DEVELOPMENT CRITERIA

PCYFF 3: DESIGN AND PLACE SHAPING

PCYFF 4: DESIGN AND LANDSCAPING

AMG 1: AREAS OF OUTSTANDING NATURAL BEAUTY MANAGEMENT PLANS

Supplementary Planning Guidance – Tourist Facilities and Accommodation

Supplementary Planning Guidance – Maintaining and Creating Distinctive and Sustainable Communities

2.4 National Policies:

Planning Policy Wales (February 2021)

Future Wales: The National Plan 2040

Technical Advice Note 13 – Tourism

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3. Relevant Planning History:

None

4. Consultations

Community/Town Council:	Not received
Transportation Unit:	Not received
Welsh Water:	Observations for the applicant
Natural Resources Wales:	Significant concerns regarding the visual impact of the development on the AONB – request a Visual Assessment to support the application
Caravans Officer:	Observations for the applicant
Biodiversity Unit:	Not received
CADW:	Not received
Public Consultation:	A notice was posted on the site and neighbours were notified. The consultation period has ended and no correspondence was received regarding the proposal.

5. Material Planning Considerations:

The principle of the development

- 5.1 It is a requirement that planning applications be determined in accordance with the adopted development plan, unless other material planning considerations state otherwise. The Anglesey and Gwynedd Joint Local Development Plan (LDP) is the adopted 'Development Plan' in this case.
- 5.2 The main policy relating to static caravan sites is Policy TWR 3 of the LDP – "Static Caravan, Chalet and Permanent Alternative Camping Accommodation Sites". Part 4 of the policy states that proposals to improve existing static caravan and chalet sites through:

- I. *small extensions to the area of a site, and/or*
- II. *the relocation of units from prominent locations to less prominent locations, and/or,*
- III. *a small increase in the number of units on the site*

will be permitted providing all of the following criteria can be met:

- 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. 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;*

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VI. *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;*

VII. *That it is appropriate in the context of other policies in the Plan.*

5.3 This proposal is considered against these criteria below:

- Criterion I – The policy does not give guidance on what is meant by 'small' in terms of area, however, it is noted that the area of the proposed extension is approximately the same size as the area of the existing site. Consequently, the proposal is not considered to be a small extension compared to the area of the existing site.
- Criterion II – This is not an application to relocate units
- Criterion III - Paragraph 6.3.74 of the Development Plan states, as a general rule, that a rough increase of 10% above the number of units that existed prior to making the application is considered as minor. In this case the proposal seeks to increase the numbers by 47% and therefore it is not considered that the increase would be "small" in accordance with the requirements of the policy.
- Criterion IV – There does not appear to be any intention as part of the application to introduce improvements to the existing caravan park and therefore it is not considered that the proposal is part of a plan to improve the range and quality of tourist accommodation and facilities on the site;
- Criterion V – The site of the proposal can be seen from public locations and no landscaping plan has been submitted as part of the application. As Aberavon Holiday Park is located directly opposite Tyn y Cae Caravan Park, consideration must be given to the cumulative impact on the landscape as a result of allowing more plots for static caravans in this location, especially given its proximity to the AONB. The visual impact is discussed further below.
- Criterion VI – This is not an application to improve the safety of residents within the Coastal Change Management Area.
- Criterion VII – See comments above regarding criteria I, III and IV.
- Criterion VIII – See discussion below.

5.4 Given the above, it is considered that the principle of this application is contrary to the aims of policy TWR 3 and therefore there is no option but to refuse the application.

General and residential amenities

5.5 Generally, policy PCYFF 2 of the Joint Local Development Plan approves proposals for new developments provided they do not have a detrimental impact on the health, safety or the amenities of the residents of local properties or on the area in general, and policy PCYFF 3 requires that proposals enhance and improve the character and appearance of the site. 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.

5.6 Natural Resources Wales expressed concern over the visual impact of the plan, particularly when considering its proximity to the AONB boundary. They suggested that a Visual Assessment of different viewpoints should be prepared to better understand the impact of the plan on the landscape. Given the above and considering that the scheme is not acceptable in terms of policy principle TWR 3, it is not considered reasonable to require the applicant to provide such a document as the proposal would not be acceptable in any event.

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- 5.7 That being said, the development would be visible from the B4417 which abuts the site on the north-eastern side and would be visible from the uplands of the AONB to the east. The Landscape Sensitivity and Capacity Assessment prepared for Gwynedd and Anglesey Councils and Snowdonia National Park, places this location within the G06 Landscape Character Area of the North Coast of Llŷn and indicates that there is no further capacity for static caravan / chalet developments in the area other than occasional, very small-scale developments that are well-matched to existing settlements / buildings. Although it is recognised that screening exists around the site due to the existing hedgerow, the site remains prominent from highway points and the development would have a cumulative effect from distant viewpoints as a result of merging two sites and filling the existing green space between the Tyn y Cae and Aberavon sites.
- 5.8 Given the above, it is considered that the visual impact of the proposal would be unacceptable and therefore the proposal is contrary to policies PCYFF 2, PCYFF 3 and PCYFF 4 of the LDP as well as Policy AMG 1 as it would be detrimental to views out of the AONB.

The Welsh Language

- 5.9 The Supplementary Planning Guidance (SPG) 'Maintaining and Creating Distinctive 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 proposal does not reach the thresholds to submit a Welsh Language Statement or a Report on a Welsh Language Impact Assessment; however, 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.
- 5.17 No information was received to show what consideration had been given to the Welsh language when drawing up this plan, however, given the fundamental objection to the plan in terms of policy TWR 3, no further information was sought on this matter.

6. Conclusions:

- 6.1 Based on the above assessment it is not believed that the proposal is acceptable as it is contrary to the criteria of the main relevant policy in the development plan such as TWR 3. In addition, it is considered that the development would be detrimental to the rural landscape adjacent to the AONB – contrary to the requirements of policies PCYFF 2, PCYFF 3, PCYFF 4 and AMG 1 of the LDP.

7. Recommendation:

To refuse – reasons:

It is not considered that the extension to the caravan site would be small in terms of the site area or the number of caravans, nor would there be any improvements to the existing site as part of the plan and the site extension would cause visual harm to the landscape, in a location adjacent to the Llŷn Area of Outstanding Natural Beauty. For these reasons the application is contrary to Criteria I, III, IV, V and VII of Part 4 of Policy TWR 3 of the Anglesey and Gwynedd Joint Local Development Plan 2011-2026, together with policies PCYFF 2, PCYFF 3, PCYFF 4 and AMG 1 as they relate to protecting the quality of the rural landscape in a location close to the Llŷn Area of Outstanding Natural Beauty boundary.