

PLANNING COMMITTEE	DATE: 04/07/2022
REPORT OF THE SENIOR PLANNING AND PUBLIC PROTECTION SERVICE MANAGER	

Number: 8

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 third class 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 was deferred on this application at the meetings of the Committee held on 24 September 2020 and 12 July 2021 in order to give the applicant an opportunity to submit more information to support her application. The following additional information was submitted in support of the application:
 - Landscape Statement
 - Amended site plan
 - Site cross-sections

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.

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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

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 - Refused 02/07/20

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

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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:	No objection
Transportation Unit:	No observations to offer
Natural Resources Wales:	No objection - guidance for the applicant
Biodiversity Unit:	The information submitted regarding landscaping measures is insufficient to assess their efficiency. Need a condition to ensure biodiversity improvements
Public Protection Unit:	Not received
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

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metres higher than the ground level of the existing caravan site. As part 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 eastern boundary of the site and the amended site plan shows that it is intended to plant more trees of native species on both sides of the new row of caravans. However, 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 Landscape Statement submitted notes that the current site is only visible from a restricted number of viewpoints and due to the rolling topography and the mature hedges in the vicinity of the site, views into the site are restricted and any such views are often filtered by features such as trees or topography. The Landscape Statement claims that with a moderate visual sensory, the area is capable of minor change without significantly changing its recognised features. It also notes that the proposal is set back from the public highway and footpaths and that any impact will be minor in the context of the broader landscape. It is noted that substantial new tree and hedge planting will strengthen the existing features and mitigate any visual impact.
- 5.5 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.
- 5.6 Policy PCYFF 4 of the LDP requires that every proposal should assimilate with their surroundings and will refuse proposals that do not show how consideration has been given to landscaping matters from the outset as part of the design proposal. It is realised that what the applicant notes in terms of landscaping; however, as it is noted by the Biodiversity Unit, insufficient detail has been submitted with the application to show that the intended planting and landscaping has been successful. 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.

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- 5.7 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

- 5.8 Other than the Plas yng Ngheidio farmhouse, there are two dwellings in the surrounding area, namely a bungalow known as Tŷ Ni which is within the ownership of the farm, and the property opposite which is 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 acts as a Caravan and Camping Club exempt site, therefore the use in question is unlikely to affect the property any more than it currently does. 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

- 5.9 It is proposed that the existing entrance to the site be used 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 In their response to the amended plans, the Biodiversity Unit notes that insufficient details have been submitted to impose a condition in relation to the landscaping work, and that a comprehensive landscaping plan is needed that would include proposals to improve biodiversity, including the long-term management. However, it is noted that the site is improved pasture/grassland and therefore the development would not lead to the loss of an important habitat.

Licensing Matters

- 5.11 The Council's Licensing Enforcement Officer expressed concerns while considering the original application that the layout of the site, as designed, would not be appropriate to receive a caravan site licence as a fire hazard would derive from the proximity of the

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caravan plots to each other. No response was received to date in relation to the amended plan received. 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 without confirmation from the Licensing Officer that the new plan is acceptable.

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 any 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 needed 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. The applicant notes that the development would add to the caravan site and that it would help to ensure a future for the next generations in Plas-yng-Ngheidio and that it would give young people an opportunity to remain in their home areas. Although no formal linguistic statement was submitted, when considering the small nature of the development, it is agreed that it is unlikely that this development would lead to an additional significant impact on the community's linguistic character.

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 additional information submitted, those do not change the fact that the site is visual in the landscape and that the extension in question would be at a higher level than the existing touring caravan site on the farm. It is not believed that the extension to the site is well concealed by the existing landscape features and it is not considered that the proposal would integrate well with its surroundings. As a result, it is not considered that the proposal would do nothing to maintain, improve or restore the recognised character of the Special Landscape Area and therefore the proposal is contrary to the requirements of Policy TWR 5, PCYFF 4 and AMG 2 of the JLDP.

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7. Recommendation:

7.1 To refuse – reasons

1. This development would not be located in an unobtrusive location that is well concealed by the existing landscape features, it would be harmful to the quality of the landscape and it would not integrate appropriately to the location in open countryside. In addition, the proposal would not contribute to the maintenance, improvement or recovery of the recognised character of the Special Landscape Area. Therefore, it is considered that the proposal is contrary to the requirements of Policies TWR 5, PCYFF 4 and AMG 2 of the Anglesey and Gwynedd Joint Local Development Plan.