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REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 2

Application Number: C24/0413/30/LL

Date Registered: 28/05/2024

Application Type: Full

Community: Aberdaron

Ward: Pendraw Llŷn

Proposal: Full application for the change of use of an agricultural field to accommodate 10 seasonal touring caravan pitches additional to the main site, the erection of a toilet/shower block, soft landscape improvements, proposed entrance/exit and installation of treatment plant.

Location: Tir Glyn Caravan Site, Uwchmynydd, Pwllheli, Gwynedd, LL53 8DA

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This full application relates to extending the existing caravan site into adjacent agricultural land. It is proposed to create additional formal pitches on an existing site for 10 seasonal touring caravans along with erection of toilet/shower block, soft landscape improvements, creation of proposed entrance/exit and installation of treatment plant. Landscaping would take the form of planting a small coppice near the lowest side of the second entrance to the field in the southern part of the site while a new hedge would be planted at the rear of the proposed toilet block. There is an existing hedge along the boundary of the field boundary with the parallel public road and it is proposed to manage this hedge and create an area of long grass between the hedge and the location of the 10 new pitches within the field. The individual pitches would measure 3.5m x 7m and created by burrowing and laying a lower layer of slate aggregate in a timber frame.
- 1.2 There is planning permission for a separate site for 39 touring caravans on fields to the north and north-east of the application site. It can also be seen that land to the north of the existing application site was approved under reference C16/0878/30/LL to store up to 15 touring caravans throughout the year. The remainder of the site includes agricultural buildings, outbuildings and two residential dwellings.
- 1.3 The whole site is located in open countryside within the Llŷn AONB. It is also located within the Llŷn and Enlli Landscape of Outstanding Historic Interest. The site is served by an unclassified road that runs parallel to the farm and the existing caravan site. The development site would partly be within the Porth Meudwy wildlife site. It can be seen that established hedges are on some boundaries of the site, particularly the western boundary with the public road. The land where the development is located is existing agricultural land which is included within class 3a according to Welsh Government maps. 3a lands, along with class 1 and 3 lands, are identified as the best and most versatile agricultural land and in this case, it is identified as “good to moderate quality agricultural land.”
- 1.4 The application is submitted to the Committee as the site is larger in size than what can be determined under the delegated procedure.

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 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 7 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 2011-26, adopted 31 July 2017**

TRA 2: Parking standards

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TRA 4: Managing transport impacts

PS 6: Alleviating and adapting to the effects of climate change

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 5: Touring caravan sites, camping sites and temporary alternative camping accommodation

PS 19: Conserve and where appropriate enhance the natural environment

AMG 1: Areas of Outstanding Natural Beauty Management Plans

AMG 5: Local biodiversity conservation

AT 1: Conservation Areas, World Heritage Sites and Registered Historic Landscapes, Parks and Gardens.

Also relevant in this case are the following:

Supplementary Planning Guidance (SPG): 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 12 - February 2024)

Technical Advice Note (TAN) 13: Tourism

Technical Advice Note 18: Transportation

3. **Relevant Planning History:**

3.1 Application C16/0879/30/LL: Increase the number of touring units from 30 to 39 without compliance with condition 2 on permission reference number 2/10/134A together with an extension to the toilet block - Approved 17/11/16

3.2 Application C16/0878/30/LL: Application to continue using land to store touring caravans without compliance with condition 2 on application number 9900073FUL10 (restrict caravan storage period between 1 April and 30 September in any year - Approved 18/10/16

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- 3.3 Application 9900073FUL10 – Storing touring caravans – Approved 17/01/00
- 3.4 Application 2/10/134A: Site for 30 touring units - Approved 28/03/96
- 3.5 Application 2/10/134C: Construct toilet and washing facilities block for touring caravans - Approved 09/08/94
- 3.6 Pre-application enquiry Y21/0745 - Increase the number of touring caravans from 39 to 49 on nearby field, with additional toilet block, to meet the increase in demand for additional caravan pitches, and uncertainty regarding the income generated from livestock due to additional anticipated regulatory costs. It was responded to this enquiry referring to relevant policies and matters that would require consideration. This is the conclusion when summarising the response:

“On the whole, it is considered that this proposal corresponds quite well with the Council's general strategy to promote the sustainable growth of the rural economy; however, there is concern regarding the sustainability of extending a tourism development in a remote, rural location like this and any planning application should explain what consideration was given to environmental and economic sustainability when drawing up the proposal.

Also, when considering the sensitivity of the local environment, the success of any planning application will depend on ensuring that the physical impact of the development is acceptable. The main matter to be considered as part of any planning application would be the impact on the landscape. It will be essential to convince the Planning Authority that the caravans can be easily assimilated into the landscape in a way that does not harm the visual quality of the designated landscape.”

4. Consultations:

Community/Town Council: Not received

Transportation Unit: The applicant is requested to provide a detailed plan for the proposed access point. The plan should include information regarding: The visibility splays from the access. The gradient of the access. The surface material of the access. The dimensions of the access. Kerb line details. Whether the access will be gated or not?

Re-consultation:

It is confirmed that the service is satisfied with the details included on the new plans except for the note that the track surface will be gravel. Standard conditions and notes are requested to be included with any permission granted.

Natural Resources Wales: We have concerns regarding the application as submitted because insufficient information has been provided to support the proposal. To overcome these concerns, you should request more information from the applicant regarding foul water. Should this information not be provided, NRW would object to this planning application.

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Re-consultation:

We have concerns regarding the application as submitted because insufficient information has been provided to support the proposal. To overcome these concerns, you should request more information from the applicant regarding foul water. Should this information not be provided, we will object to this planning application.

Welsh Water:

As the proposal provides an alternative option to a public drainage system, advice must be obtained from Natural Resources Wales and/or Building Control for the different types of drainage.

The proposed development is within an area that has water supply problems where there is no intention to improve at present. The developer must fund an assessment of the water supply network to establish the type of supply that would be suitable for the site. It is suggested to include a condition to agree on these details.

Public Protection Unit:

Standard response and advice in relation to matters involving the water supply and sewage system noting that the installation of any part of the system within 10m of a stream, ground drain or ditch is not permitted. Permission must be obtained from Natural Resources Wales if the out-flow goes to the ditch. It is suggested that the applicant contacts NRW to discuss and register the septic tank or sewage treatment unit.

Land Drainage Unit:

Standard response and advice regarding sustainable drainage systems matters.

AONB Unit:

Tir Glyn farm is located in the rural area of Uwchmynydd and in the Area of Outstanding Natural Beauty (AONB). The area is also part of a Landscape of Outstanding Historic Interest. Touring caravans are addressed in policy TP9 of the AONB's Management Plan: Resist new caravan developments and extensions to existing sites in prominent locations in the landscape or coast of the AONB and promote landscaping of existing sites.

There is planning permission for 39 units on the existing site in Tir Glyn, there is also permission to store caravans. These caravans are fairly concealed as they are on lower land and on the far side of the house and farm buildings but they are visible from some nearby rights of way. It is proposed to create a new site for 10 caravans on part of an agricultural field near the farm that does not link with the existing site. The caravans would be in a row along the boundary of

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the agricultural field and the public road. It is noted that an effort has been made to protect natural features, submit new landscaping details, adopt suitable materials for the toilets, restrict lighting etc.

A Landscape and Visual Evaluation has been submitted with the application. The document refers to the AONB and it recognises that the landscape in question has been deemed of "exceptional" visual standard, that light pollution is low and that levels of tranquillity are high. Section 5 assesses the likely impact on the landscape and concludes that there would be a negligible change. In reaching this conclusion, there is some reliance on creating a small coppice to screen the development. A coppice of this type would take many years to establish and be effective. In terms of the visual assessment in Section 6, it is concluded that the impact of the development would be limited. It is agreed that the development would not be visible from some places such as the Coast Path and Cwrt Farm and that the impact would be small in distant views. However, the caravans would be visible from some locations nearby and the Evaluation does not include some of those views - such as the road from Bodermid Isaf to Bodermid Uchaf and Right of Way 89.

On the whole, there is now a substantial number of touring caravans in the community of Aberdaron which puts pressures on the local environment and services. It would be useful to undertake a survey to obtain detailed information about the number of caravans and to consider the ability of the area to cope with more units.

Licensing Officer: The development will be subject to the following Legislation in relation to Health and Safety, Fire Safety and Public Health provisions and guidance is provided about licensing-related matters. No provision is shown in the plan indicating a disabled provision (toilet, wash basin, shower) within the Planning application.

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

Biodiversity Unit: Not received

Trees Unit: Not received

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Archaeology Service: Not received

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 and visual amenities

- 5.1 As this is a site for touring caravans, the application has to be considered primarily under the requirements of policy TWR 5 of the LDP which 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 that it should also be well screened by existing landscape features and / or where the units can be readily assimilated into the landscape in a way that does not significantly harm the visual quality of the landscape. There is no doubt that a touring caravan site has been established for years at Tir Glyn. However, as it can be seen from the submitted plans, the established locations are separate lands to the north and north-east of the application site without any clear link with the proposed development. The application site itself is undeveloped land to the south of these sites with a clear gap between the sites. Therefore, instead of extending or adapting lands that are already established, it is believed that the proposal would extend and spread into existing agricultural lands, far beyond the established site. The location of the new site / extension would add to the cumulative impact across a wider area compared to the current situation and it is not believed that the proposal has managed to satisfy the relevant requirements of policy TWR 5 in full as it does not differentiate between the local and wider impact. Although touring caravans are proposed to be approved for site use, it is also noted that there is a reference to seasonal use and, therefore, pure touring units that move on a regular basis are unlikely to use the site but rather units that would remain there on a permanent basis during term time, and therefore the appearance is likely to be permanent and unchanged during this period of seasonal use.
- 5.3 The land in question includes an established hedgerow along its western boundary that would protect some views in and out from the viewpoint of the public road. It is relatively likely, as shown in the submitted information, that views from further away to the west, north and east would also be limited as a result of this hedgerow along with other nearby hedges and trees. However, it is likely that the site would be visible from some local places and the road as well as places to the south, particularly from higher ground to this direction and an extensive series of public footpaths, which include footpaths 81, 89, 77, 78, 87 and 75. It is also noted that the observations of the AONB unit state *“the caravans would be visible from some locations nearby and the evaluation does not include some of those views - such as the road from Bodermid Isaf to Bodermid Uchaf and Right of Way 89.”* It is not believed that it can be said that the development would fully assimilate into the landscape (even if it is accepted that the landscaping proposed, including the proposed coppice and current landscape, is sufficient to protect it). Although the caravans are sited behind the hedge, due to the intention to keep two separate entrances to the field open, this in itself would highlight the use more and make it more visible from the road. In

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addition, consideration must be given to the fact that there would be ancillary uses and activities in the field e.g. parked vehicles, children playing, tables and chairs etc. away from the shade of the hedge and they would highlight the presence of the site and reduce the beauty of the local area.

- 5.4 The Landscape Assessment submitted notes that the current site is only visible from a restricted number of local places 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. It is believed that the assessment plays down the impacts by mainly referring to the places where views would not be affected. It is quite clear that the current site would be seen clearly from the application site, although it would be separate, but it is not believed that sufficient recognition has been given to this correlation in terms of a cumulative visible impact. Even if there would be a clear lack of visibility between both sites, this does not mean that there would be no cumulative impact across a wider area or when travelling within the local area either in a vehicle or on foot. Having assessed the proposal in full, the impact and harm is clear. Paragraph 6.3.81 of the LDP refers to proposals for more developments of this type in the context of local established sites, noting: *“Although they are often only used for part of the year, touring caravan and camping sites are often found in prominent and open locations and can be highly prominent in the open countryside, especially along the coast. There are areas that are under extreme pressure in a number of communities located on the coast, including large parts of the Areas of Outstanding Natural Beauty. The Council will need strong evidence that proposals for more accommodation units in such areas will not add to problems for services, and will not harm the natural character or resources of these areas.”*
- 5.5 A moderate visual sensory impact could note that the area is capable of accommodating minor change without significantly changing its overall characteristics and that any impact would be minor in the context of the wider landscape. For example, the assessment states that planting new trees and hedges and improving existing hedges would strengthen the existing features and mitigate any visual impact. However, it is unlikely that the landscaping and planting work would be sufficient to screen the caravans completely for some years, if at all from some views. Planting would be limited in terms of number and location and there is no certainty that it would create a sufficient screen to fully protect views into and out of the site. A reliance on landscaping to create a sufficient screen includes an element of risk in terms of the success of any scheme and the time it will take to become established. For example, it is known that Malus Sylvestis (crab apple) trees can take over 20 years to grow to their full size and, therefore, one has to doubt whether it would be possible to ensure sufficient screening in the short-term.
- 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. In addition, policy TP9 of the AONB's Management Plan notes that there is a need to *“Carefully assess development applications in accordance with Planning Policy Wales, the Local Development Plan and this Management Plan and refuse applications that would affect the AONB.”* Policy AMG 1 notes that there is a need *“where appropriate, for proposals within or affecting the setting and/or significant views into and out of the Areas of Outstanding Natural Beauty must, where appropriate, have regard to the relevant Area of Outstanding Natural Beauty Management Plan.”* It is not considered that approving the extension of the current caravan site to lands separate and open to the established site and all the associated work on this site would be of assistance to maintain, enhance or restore the character of the AONB. Indeed, due to its location on separate, undeveloped land, it is considered that the proposal would unavoidably create further harm to the landscape of the AONB which would be partially visible from the surrounding area. It is realised that it would be seen from the direction of the south with the backdrop of agricultural

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buildings behind and then the caravan site further along; 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, causing significant harm to the visual quality of the landscape and therefore it is considered contrary to Policy TWR 5, PCYFF 4 and Policy AMG 1 of the LDP.

- 5.7 It is deemed appropriate to note here that the previous application that was submitted and approved was promoted as an application that, due to the limit of additional pitches within the field boundaries of the established site, only prevented and limited any visual impact for this established area. As a result, the need to extend the boundary of the caravan site with the potential of having an additional visual impact on the AONB was removed. With the current application, it is now believed that the site would extend beyond the established boundaries and lands of the caravan site and that, as a result, it is contrary to the previous allegation.
- 5.8 The site lies within the Llŷn and Enlli 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.
- 5.9 In the information submitted with the application, it is alleged that the site of the proposed development is relatively poor and low-use grazing land. Despite this, according to existing maps of the Welsh Government, it is identified as 3a registered land. Paragraph 3.58 of Planning Policy Wales (PPW) states that *“agricultural land of grade 3a, as well as classes 1 and 2, in the Agricultural Land Classification (ALC)16 is deemed as the best and most versatile, and should be conserved as a finite resource for the future.”*

while paragraph 3.59 states

“When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 and 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.”

- 5.10 In the response to the pre-application enquiry, this matter was raised and it was noted that justification would be needed for developing an agricultural land of this quality and which steps would be taken to protect the quality of the land for the future. Strategic Policy PS 6: Alleviating and adapting to the effects of climate change, notes:

“In order to adapt to the effects of climate change, proposals will only be permitted where it is demonstrated with appropriate evidence that they have fully taken account of the following and responded appropriately to them.”

with criterion 6 confirming the requirement to:

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“Safeguard the best and most versatile agricultural land, promoting allotments, support opportunities to produce food locally and local farming to reduce the area's contribution to food miles.”

- 5.11 Although the agent notes that the land in question is of poor quality, no evidence has been submitted for the loss of 3a quality land. There is reference to the fact that it would be easy to reverse site development work should the situation change, and it is relatively likely that work to dispose of permanent pitches could be undertaken quite easily. However, considering that the cost of undertaking the changes, namely creating 10 permanent pitches, landscaping work, erecting a permanent building as a washing facility with proposed drainage and work on the access, it is not believed that these would be developments that are likely to be reversed without incurring additional unnecessary costs. The planning authority has not been fully convinced in this case; therefore, it is not believed that the proposal as submitted is acceptable and is therefore contrary to the requirements of criterion 6 of policy PS 6 along with advice provided in Planning Policy Wales, particularly paragraphs 3.58 and 3.59.

General and residential amenities

- 5.12 Separate to the two existing dwellings on the Tir Glyn site, there are dwellings in the vicinity of the application, mainly to the direction of the east, south-east and the south. Although it extends beyond the existing established caravan site, it is not considered that a site of 10 additional touring caravans would create substantially more impact on the nearest dwellings than what is currently experienced. 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

- 5.13 It is proposed that the existing entrance to the field be used for the development. Another entrance can also be seen in the southern part of the site which is noted as a 'proposed entrance or exit'. The Transportation Unit requested further information on what is presumed will be the main entrance and having received additional information, the service confirmed that it was satisfied with the details on the new plans and suggested including standard conditions regarding the finish of the entrance etc.
- 5.14 The site location is secluded and of considerable distance to the nearest village with services, namely Aberdaron. Clearly, a vehicle will be required to visit the site while towing a caravan but it is very likely that the use of a vehicle would then be necessary to visit other places, restaurants, shops etc. Despite this, there are also opportunities to use public footpaths and although the public highway network is very narrow and winding, it is likely that some would use it to walk, cycle etc. Therefore, despite the location, it is considered that the proposal is acceptable on the whole in terms of sustainability and road safety and complies with Policies TRA 2 and TRA 4 of the LDP.

Biodiversity matters

- 5.15 The majority of the proposed development site is part of the Porth Meudwy wildlife site and the eastern part of the site includes a relatively steep slope to a small valley below which includes a small watercourse. In its response, Natural Resources Wales (NRW) states *“The stream to which the treatment plant is proposed to discharge is small, and we have concerns that any discharge*

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would have insufficient dilution prior to discharging to the West Wales Marine SAC, Pen Llŷn a'r Sarnau SAC, Aberdaron Coast and Bardsey Island SPA, and Glannau Aberdaron SSSI."

- 5.16 No further response was received to this matter by the agent at the time of writing this report and, therefore, as it stands and due to these concerns, NRW objects to the application as submitted because of insufficient information provided to support the proposal.
- 5.17 The lack of information here means that the proposal cannot be fully assessed as to its impact on the Special Area of Conservation which is itself a reason for refusing such a proposal. The implications, whether significant or not, are matters that cannot be fully considered as it stands and because of that, it fails to meet the fundamental requirements of policies PS 19 and AMG 5.
- 5.18 In accordance with recent legislative changes to Planning Policy Wales (PPW) and the need to submit a Green Infrastructure Statement, a statement has been submitted and for the purpose of satisfying PPW in terms of this particular aspect, it is believed that this has been done in this case.

Linguistic matters

- 5.19 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.
- 5.20 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 (section Ch to Dd). The guidance contained in Appendix 5 states that all retail, commercial or industrial developments that are not required to submit a Welsh Language Statement/Assessment should demonstrate how consideration has been given to the language. The applicant notes that the development would be a way of ensuring that the farm and the caravan site remain economically viable and sustainable to ensure that the business remains in the hands of first language Welsh speakers who have been here for generations. 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.

Accessibility Matters

- 5.21 It can be seen from the response of the Licensing Officer that no provision for disabled people is proposed within the new toilet/shower block and that disabled provision must be shown in the proposed scheme. The information submitted as part of the application recognises this and it is alleged that this is an attempt to keep the size and volume of the proposed building smaller while an accessible toilet is provided in the main toilet block of the site which already provides for disabled visitors to the site. In response to this, although recognising an attempt to reduce the size of the proposed building and its resulting visible impact, it is not believed that the proposal would be acceptable or practical for disabled users of the proposed site by asking them to use facilities which are a considerable distance away without a clear and accessible right of way to reach them.
- 5.22 Including provision and resources to ensure an inclusive development is a material planning consideration with criterion 7 of policy PCYFF3 noting *"That the layout and design of the development achieves an inclusive design by securing unobstructed environments; which enables access for all and offers a comprehensive provision for disabled people."* Therefore, it is believed

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that the development as submitted is unacceptable based on this shortcoming and that, as a result, it is contrary to the requirements of criterion 7 of policy PCYFF 3.

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 unavoidably harmful to this landscape within the AONB. Therefore, it is considered that the proposal is contrary to criterion 1 of Policy TWR 5 of the LDP.
- 6.2 In acknowledging the points made by the applicant in the additional information, including the landscape evaluation submitted, those do not change the fact that the site is visible in the landscape and that the extension in question would be in an entirely separate location to the existing touring caravan site near the farm. It is not believed that the extension to the site would be completely screened by the existing features of the landscape 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 anything to maintain, enhance or restore the recognised character of the AONB and therefore the proposal is contrary to the requirements of Policies TWR 5, PCYFF 4 and AMG 1 of the LDP.
- 6.3 The economic situation in the countryside and associated with agriculture is very much known in terms of the seriousness of securing economic viability. The principle of a new development that would contribute towards improving the local economy is therefore fully supported. However, this does not mean that any proposal submitted can be permitted and proposals must fully comply with the relevant requirements of policies that protect a highly sensitive area such as this one from unacceptable new developments.

7. Recommendation:

- 7.1 To delegate powers to the Senior Planning Manager to refuse - reasons:
1. This development would not be located in an unobtrusive location that would be completely screened by existing landscape features and landscaping proposals, it would be harmful to the quality of the landscape and it would not integrate appropriately to its location in open countryside. In addition, the proposal would not contribute to the maintenance, enhancement or restoration of the recognised character of the Llŷn Area of Outstanding Natural Beauty. Therefore, it is considered that the proposal is contrary to the relevant requirements of Policies TWR 5, PCYFF 4 and AMG 1 of the Anglesey and Gwynedd Joint Local Development Plan.
 2. Insufficient information has been submitted as part of the planning application to enable the Local Planning Authority as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), to make an appropriate assessment on the implications of the project on the Pen Llŷn and Sarnau Special Conservation Area. The proposal therefore does not show that the proposal would protect or improve the natural environment and therefore the application is contrary to the requirements of Policies PS 19 and AMG 5 of the Anglesey and Gwynedd Joint Local Development Plan 2011-2026.
 3. Insufficient evidence has been presented as part of the planning application to demonstrate that full account has been taken to the loss of the best and most versatile agricultural land. The proposal therefore is considered to be contrary to the requirements of criteria 6 of Policy PS 6 of

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the Anglesey and Gwynedd Joint Local Development Plan 2011-2026 and advice provided in paragraphs 3.58 and 3.59 of Planning Policy Wales.

4. It is not considered that the development as submitted achieves inclusive design due to the lack of specific facilities and resources for disabled users, the proposal is therefore contrary to the requirements of criterion 7 of policy PCYFF 3.