

PLANNING COMMITTEE	DATE: 29/09/2025
REPORT OF THE ASSISTANT HEAD OF SERVICE	

**Number: 2**

**Application Number:** C25/0202/40/LL

**Date Registered:** 12/03/25

**Application Type:** Full

**Community:** Llannor

**Ward:** Abererch

**Proposal:** Application for change of use to locate 12 Holiday Cabins on land at Y Ffôr, Pwllheli.

**Location:** Land At Y Ffôr, Pwllheli, LL53 6UT

**Summary of the Recommendation:** TO REFUSE

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## **1 Description:**

- 1.1 An application to change the use of agricultural land and develop new holiday accommodation in the form of 12 permanent holiday cabins and associated parking, alterations to the access, drainage and landscaping. The proposal has been submitted as a diversification project on a 280-hectare livestock local family farm. The applicant does not state where the acres are located, however, the applicant's home is situated in Penrhyndeudraeth. The wooden cabins would be timber clad and stained in a conservation colour. Each of the cabins would include sleeping rooms, a bathroom, living room and kitchen / dining room. The proposal is to locate 12 cabins of 3 different designs measuring on average 13 metres long and around 7 metres wide on the site.
- 1.2 The units would be sited in the corner of an agricultural field abutting a narrow and winding class 3 road. It is noted that the adjacent county road connects to the class 1 county road from Pwllheli to Y Ffôr and the class 2 county road from Y Ffôr to Nefyn.
- 1.3 The following documents have been submitted as a part of the application:
  - Ecological Assessment
  - Green Infrastructure Statement
  - Design and Access Statement
  - Drainage Strategy
  - Transport Statement
- 1.4 The site is in the countryside. Although there is no special landscape designation to the application area, it is of an undeveloped appearance and rural character landscape. A residential property, not in the applicant's ownership, is located around 110m to the east and south-west of the site. The site's topography slopes down from the land towards the county road.
- 1.5 It is proposed to develop a private clean and foul water drainage system for the proposal.
- 1.6 The landscaping scheme submitted with the application shows a proposal to plant a vast number of trees along the south-western and south-eastern boundary of the site, as well as to reinforce the current hedge along the county road; however, details of that scheme were not received with the application.
- 1.7 The site is served by an existing access to the adjacent county road.
- 1.8 The developer has not submitted the results of any porosity / percolation tests in relation to the private sewerage system.
- 1.9 The application is submitted to the Planning Committee as the application site is greater than 0.5 hectares.

## **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

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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**

PS 1: The Welsh Language and Culture

ISA 1: Infrastructure Provision

PS 4: Sustainable transport, development and accessibility

TRA 2: Parking standards

TRA 4: Managing transport impacts

PS 5: Sustainable Development

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 3: Static Caravan and Chalet Sites and Permanent Alternative Holiday Accommodation

PS 19: Conserve and where appropriate enhance the natural environment

AMG3: Protecting and Improving Features and Qualities that are Unique to the Character of the Local Landscape

AMG 5: Local biodiversity conservation

PS 20: Preserving and where appropriate enhancing heritage assets

AT 4: Protection of non-designated archaeological sites and their setting

Supplementary Planning Guidance: Tourist Facilities and Accommodation (March 2021)

Supplementary Planning Guidance (SPG): Maintaining and Creating Distinctive and Sustainable Communities

## 2.4 **National Policies:**

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 11 - February 2021)

Planning Policy Wales (Edition 12 - February 2024)

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Technical Advice Note: 5 Planning and Nature Conservation (2009)

Technical Advice Note: 12 Design: June (2016)

Technical Advice Note 15: Development and Flood Risk (2004)

Technical Advice Note: 18 Transport: March (2007)

### 3. Relevant Planning History:

3.1 C23/0280/40/LL - New agricultural access – Approved – 24.05.2023.

### 4. Consultations:

Community/Town Council: Observations from Llannor Community Council: Refuse, change of use of agricultural land in an area of open countryside, no other evidence of diversification and nobody living on the site on a permanent basis. Concern about traffic issues for drivers and pedestrians on a sub-standard road. Concern about pedestrians walking home along an unlit, narrow road, late at night, from a nearby public house. Over-development in an area where several holiday accommodations in the area are unable to reach the letting threshold and have to pay the Council Tax premium.

Transportation Unit: I refer to the above application and I confirm that the transportation unit does not have any objection. I request that the following conditions/notes are included with any planning permission granted:

The access must be planned and built in complete accordance with the submitted plan

The applicant must take every precaution to prevent surface water from the curtilage of the site from discharging onto the highway.

Further observations:

Concerns have been raised about the suitability of the road to provide for the traffic, which is likely to be generated by this proposal, as well as the validity of the data obtained from the traffic speed survey. I offer the following observations:

The site is located around 0.5km from the A499, which means that a vehicle travelling on a consistent speed of 20mph reaches the site in less than a minute.

Considering the size of the proposed cabins, it is expected that most of the users would be family groups arriving in a single vehicle.

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Consequently, it is very unlikely that the site's capacity of 24 vehicles would be reached at any given time. Because of the site's proximity to the A499, it is anticipated that most vehicle journeys would derive from that direction. Many points have been widened along the road reaching to the site access.

Concerns have also been raised about the accuracy of the average speed of vehicles, reported as 22.6mph, travelling to the south-east, particularly due to the highway geometry in the traffic survey location. Although it is acknowledged that approaching speeds from the west could actually be higher, the nature and dimensions of the highway in the vicinity of the site suggests that any difference would not be huge.

A proposed visibility splay of 2.4m x 37m would be appropriate for the sites with vehicular approaching speeds of up to 28mph. It should also be noted that the splay has been plotted a full 2.4m from the vehicular road and to the nearest verge. Considering the width of the vehicular road and the fact that the vehicles approaching would be on the far side, it would be reasonable to plot the splay to the middle of the road, instead of to the nearest verge. Additionally, the road features would allow for reducing the road measurement from 2.4m to 2.0m. These two assessments would extend the visibility available beyond the 37m currently shown in the application.

I confirm, for the above reasons, that the transportation unit does not object. I request that the following conditions/notes are included with any planning permission granted:

CONDITIONS: The access must be planned and constructed in full accordance with the submitted plans. The applicant must take every precaution to prevent surface water from the curtilage of the site from discharging onto the highway.

Natural Resources Wales:

We have concerns regarding the application as submitted as insufficient information has been provided to support the proposal. To overcome these concerns, you should ask for more information from the applicant regarding foul drainage. Should this information not be provided, we will object to this planning application. Further details are provided below.

#### Foul Drainage

We understand that the development is not served by the public sewer, and the application form notes that foul drainage is to be discharged to the private sewage treatment system.

Under these circumstances, the Welsh Government Circular 008/2018 advises that full and detailed consideration should be given

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to the environmental criteria listed under paragraph 2.6 of the Circular, to justify using the private sewerage. In this case, insufficient information has been provided in relation to the private sewerage system and the location of the proposed drainage. The application, therefore, does not provide sufficient grounds for an assessment to be undertaken of the pollution risks to the water environment, deriving from the proposed development.

Specifically, the application submitted does not show that removing the foul effluent from the proposed private sewerage system would be effective in this location. The developer has not submitted the results of any porosity / percolation tests in relation to the private sewerage system. Also, there are no calculations for the specific size of the proposed drainage area or the location of the foul effluent discharge.

Therefore, we ask for details about the location and size of the drainage area, as well as the results of the percolation tests to be submitted before a decision is made on the application.

The developer must ensure that there is sufficient space in the drainage field as noted in BS 6297:2007+A1:2008.

After receiving the above information, we will review our position and inform your Authority in line with that.

Applicants who wish to implement a private sewerage system must *either* apply to us for an environmental permit *or* register with us to be exempted from the permit's requirements. Septic tanks and small sewage treatment units that meet certain criteria may be registered as exempt.

A step-by-step guide to register an exception is available on our website.

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found [here](#). Should a permit be required, further information may be required as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure that there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application service can be found [here](#).

It is important to note that a grant of planning permission does not guarantee that a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to a mains sewer is practicable. Applicants are encouraged to ensure they have all the required permissions, consents, permits and any other approvals in place prior

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to commencement of works on the site.

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer the Applicant to Guidance for Pollution Prevention 4 on the NetRegs website, which provides further information.

### **Protected Species**

We note that the information submitted to support the above application (Ecological Surveys for Proposed Holiday Lodges, Y Ffôr, Pwllheli by Gritten Ecology dated 26 June 2024) noted that it is unlikely that protected species are using the application site. Therefore, we have no comments to make on the application as submitted in relation to bats.

We recommend that you discuss the need to ensure more measures or avoidance measures with your internal ecological adviser.

Welsh Water:

Since the proposal intends utilising an alternative to mains drainage we would advise that the applicant seek advice from Natural Resources Wales and or the Local Authority Building Control Department / Approved Building Inspector as both are responsible to regulate alternative methods of drainage. However, should circumstances change and a connection to the public sewerage system/public sewerage treatment works is preferred we must be re-consulted on this application.

Public Protection Unit:

If the applicant wishes to install a New system, the sewage tanks and subsidiary system must comply with British Standard 6297:2007 + A1 2008, and Approved Document H (Drainage and waste disposal) of the Building Regulations. It is not permitted to install any part of the system within 10 metres of a stream, ground drain or ditch. The applicant should provide details of the percolation tests that have been conducted for the stone ditch to ensure that the soil is suitable. The applicant will need to contact Natural Resources Wales to register any sewage tanks or compact sewage treatment units.

Welsh Archaeological Trust:

The application site is located within the Llŷn and Ynys Enlli Registered Landscape of Outstanding Historic Interest. The proposed development is not of a scale that requires a specific assessment of impact on the Registered Landscape (ASIDOHL), but the character of the landscape as containing a diverse archaeological resource is relevant. Near the site, the HER records a Late Neolithic/Early Bronze Age burial chamber (scheduled monument

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CN095), an enclosed hut settlement of presumed late Iron Age/Roman date (PRN 435), a medieval holy well (LB 21323) and several post-medieval farms. None of these is directly affected by the proposals, but they serve to illustrate the range of archaeology that might exist locally.

Historic mapping and aerial photographs indicate a long history of agriculture at the site. In common with much of lowland Llŷn, decades of ploughing and land improvement have removed any surface traces of any archaeological features that might be present, although buried deposits may survive. This has created a data bias in the HER where sites have survived better, and are consequently better recorded, in more marginal land; however, fieldwork is consistently demonstrating that more productive agricultural land has always been intensively utilised and settled. There is therefore considered to be a general potential for archaeological evidence to be present in undeveloped land in the peninsula, particularly of early medieval and earlier date.

To inform upon the presence or absence of buried archaeology, and any potential impact upon this from the development and ancillary work, it is recommended that a geophysical survey of the application site is undertaken. In accordance with Planning Policy Wales 12 para. 6.1.26 and JLDP Policy AT4 with para. 6.5.46, this should be undertaken prior to determination of the application, to enable the planning authority to make an informed decision and allow for any design revision or further action to be completed. The survey must be undertaken by an appropriate professional firm, who must agree a specification for the work with us in advance. The resulting report must be submitted to and approved by the local planning authority.

#### Biodiversity Unit

This development is likely to avoid any significant impact to biodiversity.

Mitigation for any potential operational impact of the development and biodiversity enhancements are implied by the drawings, but a more detailed soft-landscaping plan should be provided before planning is determined.

This should include:

Tree species to be planted

Number and density of trees / shrubs planted

Planting method

Any ongoing maintenance requirements

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Specification of wildlife boxes to be installed

Locations of wildlife boxes

Licensing:

Units - Structures

It appears that the proposed 'units' are within the definition of a 'structure', and they are not defined as a caravan on wheels and therefore, a site licence will not be required. However, the requirements of the Health and Safety at Work etc. Act 1974, Fire Regulations and other Regulations would be relevant.

Should the units be defined as a 'caravan on wheels', a site licence would be required along with full compliance with the licence condition requirements (Model Standards 1989) under the Caravan Site and Control of Development Act 1960. Model Standards 1989 [www.gwynedd.llyw.cymru/trwyddedcarafanau](http://www.gwynedd.llyw.cymru/trwyddedcarafanau)

Units - Structures

The proposed units appear to be of the definition of a 'structure' and may not be the definition of a caravan on wheels and therefore a site license will not be required. However, the requirements of the Health and Safety at Work Act 1974, Fire Regulations and other Regulations would apply.

If the 'units' are defined as a 'caravan on wheels', a site license will be required and full compliance with the requirements of license conditions (Model Standards 1989) under The Caravan Sites and Development Control Act 1960. Model Standards 1989 - Static Caravans [www.gwynedd.llyw.cymru/caravanlicence](http://www.gwynedd.llyw.cymru/caravanlicence)

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Public Consultation:

A notice was posted on site, and nearby residents were notified, and correspondence was received objecting on the grounds of:

- The road is busy.
- Cars travel quicker than 20mph as noted in the application.
- Road traffic speed measuring equipment installed on a blind corner where Traffic would slow down naturally.
- Cars come face-to-face along the road and create problems for local residents.
- Existing sites unable to reach their numbers and so the situation would be exacerbated.
- Would create a precedent for similar developments.
- Applicant is not local and not in a position to look after the site.
- The proposal would increase noise, traffic and activity on the site, county road and local area.
- Would disrupt the landscape.
- A499 Junction (Pwllheli to Y Ffôr) is dangerous.
- Additional traffic disrupting the amenities and enjoyment of users of the adjacent road on foot.
- Water supply problems.
- Concerns raised about the value of the proposal to the local economy.
- The information regarding the speed of traffic on the road in the Transport Report is incorrect.
- Water Strategy prepared during August 2024, a dry time of the year. There is substantial surface water on the road and fields in the winter.
- No convenient passing places along the adjacent county road.
- The applicant lives outside Dwyfor and has no house in the local area; this would cause difficulties in terms of supervising and keeping order at the site.

## 5. Assessment of the material planning considerations:

### The principle of the development

- 5.1 The application site is in an area that is defined as open countryside in the LDP. Policy PCYFF1 of the LDP states that proposals located outside development boundaries will be refused unless they are in accordance with specific policies in the LDP or national planning policies or that the proposal demonstrates that its location in the countryside is essential.
- 5.2 The application site is in an area that is defined as open countryside and is within a Landscape of Special Historic Interest.
- 5.3 It is proposed to change the use of an agricultural field for the siting of 12 holiday cabins. Paragraph 5.1.1 of the Tourist Facilities and Accommodation SPG provides guidance on the type of 'cabins' is covered in the description of a 'chalet' for the purposes of policy TWR 3. If it is considered that the 'cabins' fall under the description of a 'chalet', then policy TWR 3 applies. Criterion 1 of Policy TWR3: Static Caravan and Chalet Sites and Permanent Alternative Holiday Accommodation, notes:

1. Proposals for the development of new static caravan sites (i.e. single or twin caravan), holiday chalet sites or permanent alternative camping accommodation will be refused within the Anglesey

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Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas. In other locations, proposals for new static caravan or holiday chalet sites and permanent alternative camping accommodation will only be granted where:

- i. It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; no information has been submitted with the application to show that it would not create an over-provision in the area, bearing in mind that there are several caravan sites in the local area.
  - ii. That the proposed development is of 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 units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and; the site provides 12 cabins sited close together and the site does not include any additional services or facilities including a reception, play area or open space. The proposal is located in an open field which is visible and obvious to users of the county road; installing 12 cabins as proposed would have a substantial harmful impact on this rural landscape.
  - iii. That the site is close to the main roads network and that adequate access can be provided without significantly harming landscape characteristics and features; it is noted from the site's planning history that planning permission was granted to create a new agricultural access to the field in 2023, and the proposal uses that access and therefore the plan does not show further work.
- 5.4 1i) specifically refers to an excess of new developments. To define 'excess' in this context, one should refer to the paragraph of explanation in 6.3.69 in policy TWR 3 (along with Appendix 3 - Sensitivity and Capacity Maps (paragraph 5.3.3), SPG Tourist Facilities and Accommodation) that refers to the 'Anglesey, Gwynedd and Eryri National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within each Landscape Character Area (as described by the Gwynedd Landscape Strategy (2012) the landscape's character is assessed to ascertain the capacity of the local landscape for further developments of holiday chalets or caravans.
- 5.5 This specific development falls within the G10 Landscape Character Area (Mid Llŷn). The Landscape Sensitivity and Capacity Study notes the indicative capacity for the Landscape Character Area. Specifically, in relation to the LCA relevant to this application, it is noted, "Outside the AONBs and SLAs there may be very limited capacity for developments typically comprising of small scale to very small scale, sensitively sited and well-planned developments that should relate well to the existing built environment / urban ground cover". The Study defines very small developments as those up to 10 units and small developments as those between 10 - 25 units. Therefore, appropriate consideration will need to be given to the scale of the proposed development in the location in question. It is noticed that the proposal falls within the definition of a small development, nevertheless, attention is drawn to the fact that the Study refers to the built environment / existing urban land cover and therefore not within an area of countryside. It is also noted that the Study represents a strategic study, and it is not prescriptive on a site level. Therefore, it is considered that the proposal is contrary to this criterion based on this location.
- 5.6 1ii) refers to the design, layout and appearance of the proposed development, and that it is of a high quality. The policy states that new developments should be in an unobtrusive location. Within the Plan, an unobtrusive location is described as one which is well screened by existing landscape features 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.

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- 5.7 Policy AMG3: 'Protecting and improving Features and Qualities which are unique to the Character of the Local Landscape' states that proposals must demonstrate that they do not have a significant adverse impact upon features and qualities that are unique to the local landscape in terms of visual, historic, geological, ecological and cultural aspects.
- 5.8 Furthermore, Policy PCYFF 4: 'Design and Landscaping', states that all proposals should integrate into their surroundings. Proposals that have not considered landscaping matters from the outset as part of the design proposal should be refused.
- 5.9 The units are in an agricultural field located in open countryside. The field is on a slight slope which runs down towards the county road and the access. The units are in the corner of the field near the access; a site that is visible and prominent to the public. The units are located close together and as the site is currently an open field, it is proposed to landscape around the units and the site. It is realised that a hedge runs along the top of a north-eastern boundary *clawdd*, but not the lowest part near the access, this is very dense and therefore creates an effective screen. It is also realised that the access proposes substantial landscaping work along the side of the chalets' field to create a new screen. The Policy asks for sites to be screened effectively by existing and not proposed features; therefore, the application fails at this point.

### Visual amenities

- 5.10 Policy PCYFF 3 states that proposals will be approved, including extensions and changes to existing buildings and structures, if they comply with a number of criteria including that the proposal adds to or improves the character or appearance of the site, the building or the area in terms of setting, appearance, scale, mass, the height and elevation treatment; that it respects the context of the site and its place in the local landscape; that it uses materials that are appropriate to their surroundings and incorporates soft landscaping; that it improves a safe and integrated transport and communications network; that it limits the risk and danger of flood water run-off and prevents pollution; that it achieves an inclusive design that allows access for all and helps to create healthy and vibrant environments taking into account the health and well-being of future users.
- 5.11 The site lies within an agricultural field in open countryside, with the appearance and character of the site characteristic of the open agricultural lands in the area. The hedge on the top of the north-eastern boundary of the site creates a less than effective screen for the proposal, which creates a visible site from the adjacent county road.
- 5.12 The proposal involves installing 12 substantially-sized wooden cabins on the site with ancillary work including a landscaping plan. The holiday units would occupy land along the boundary of the county road.
- 5.13 Criterion 1 ii of Policy TWR 3 states that the development should be of high quality and situated in an unobtrusive location that is well concealed by the existing landscape features, and/or where the units can be easily assimilated in the landscape in a way that does not cause substantial harm to the visual quality of the landscape. Policy PCYFF 3 in the LDP requires such developments to respect, improve and add to the character and appearance of the area. It is not considered that the proposal would achieve those requirements. It is realised that the plan shows landscaping work around the site, but such work would take years to establish, and it is neither a permanent feature in any case, nor a natural feature of this area. It is considered that establishing timber cabins on the site would have a substantial negative impact on the area, contrary to the objectives of Policy TWR 3 and PCYFF 3 of the LDP.

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### **General and residential amenities**

- 5.14 The application was advertised on the site and nearby residents were informed and correspondence was received objecting to the application for the reasons noted under the Public Consultations chapter above. The site is in open countryside, a site and area that is free of commercial activities, excluding occasional agricultural machinery on the fields, as well as light traffic on the roads. It is realised that there is a historical static caravan site over 500 metres to the south-west. Residential houses are dispersed here and there, and two are located within c.150m to the south-east and south. A house named Bodlas (nearest house) is located near the road, with an access to the road.
- 5.15 It is considered that the site's activities, along with an increase in traffic generated by the proposal along the quiet road, would disrupt the tranquillity of the area and the character and attractive appearance of the local rural area. The proposal does not include any reception or recreational facilities, e.g., an open parcel of land or playing field for children; therefore, there will be no supervision of the site, and it is likely that those staying on the site will use the open field area behind or around the site for recreational activities or for walking their dogs. The activities that are characteristic of people on their holidays are different to the activities of those of residential properties and could include periods of loud noise at times during the night, as well as regular vehicular movements. It is considered that this could cause a substantial detrimental impact to the amenities of nearby residents. The proposal is therefore contrary to policy PCYFF 2 of the LDP.

### **Transport and access matters**

- 5.16 It is proposed to develop a static cabin site for 12 units. The site is in open countryside with access gained along a narrow and winding Class 3 County Road. There is an existing access to the site, and entrance developed following the granting of planning consent as an agricultural access in 2023.
- 5.17 It is noted that the Planning Service has received correspondence objecting to the proposal because of the statutory publicity given to the matter. It is noted that concerns have been raised about the suitability of the road to provide for the traffic, which is likely to be generated by this proposal, as well as the validity of the data obtained from the traffic speed survey. Further observations were received from the Transportation Unit on these objections, which are included in the consultations table above.
- 5.18 The concerns of the local residents are acknowledged, however, the observations received from the Transportation Unit provides a full assessment of the road's circumstances and why the proposal would not cause road difficulties. In the above circumstances, it is not considered that the proposal would be substantially contrary to Policy TRA 4 of the LDP.
- 5.19 It is noted that there will be a parking provision for every unit in the site, and the Transportation Unit has not raised concerns about that. The proposal would not be contrary to Policy TRA 2 of the LDP.

### **Biodiversity matters**

- 5.20 The proposal involves developing a section of an agricultural field to create a holiday cabin site. The work would include installing the cabins on the land, creating an access road through the site, as well as other associated work. An ecological report was received with the application and the comments of the Council's Biodiversity Unit states that the likely proposal avoids any impact on biodiversity and that there is a proposal to provide biodiversity enhancements. Should the proposal be acceptable, a planning condition could be imposed to receive further information about the

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biodiversity enhancement being proposed. To this end, it is considered that the proposal is acceptable and complies with the requirements of policy PS19 of the LDP as well as chapter 6 of Planning Policy Wales, which relates to the step-wise approach.

### **Archaeological Matters**

- 5.21 Comments were received from Heneb on the application, which stated that an archaeological survey should be conducted before deciding on the application. The Department sent this information to the applicant, but no response was received. Despite that, the assessment would not have changed the view of the officer that the application cannot be supported due to the proposal's impact on the landscape. Nevertheless, it is not considered that sufficient information has been submitted as a part of the application to confirm that the proposal is acceptable in terms of policy AT4 of the LDP.

### **Drainage Matters**

- 5.22 The proposal includes providing a new Sewerage Treatment System to deal with foul water waste from the development. Natural Resources Wales have confirmed that insufficient information has been submitted as a part of the application. Their comments confirm that the application submitted does not show that it would effectively dispose of foul effluent from their proposed private sewerage system in this location. The developer has not submitted the results of any porosity / percolation tests in relation to the private sewerage system. Also, there are no calculations for the specific size of the proposed drainage area or the location of the foul effluent discharge. Therefore, there is a need to submit details on the size of the drainage area as well as the results of percolation tests, before a decision is made on the application. The comments from Public Protection reiterate this. Therefore, it is considered that there is insufficient information to confirm that the proposal is acceptable and therefore it is contrary to the requirements of Policy ISA 1, which ensures a sufficient infrastructure provision.

### **Language Matters**

- 5.23 In accordance with the Planning (Wales) Act 2015, it is a duty when determining a planning application to consider the Welsh language, where it is relevant to that application. This is reiterated further in para 3.28 of Planning Policy Wales (Edition 12, 2024), along with Technical Advice Note 20.
- 5.24 Supplementary Planning Guidance (SPG) 'Maintaining and Creating Unique 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.
- 5.25 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 Report on the Welsh Language Impact Assessment. The thresholds in terms of when it is expected to submit a Statement/Report have been highlighted in Policy PS1 of the Joint LDP, along with Diagram 5 of the SPG. The proposed development does not reach these thresholds.
- 5.26 Excluding the developments reaching the thresholds for submitting a Welsh Language Impact Statement/Assessment noted in Policy PS1, guidance is given on the types of relevant applications where consideration needs to be given to the Welsh language in Appendix 5 (The Screening Process) of the SPG (part 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. It

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appears that no information has been submitted with the application stating how consideration has been given to the Welsh language when drawing up the proposal. To this end, it is not possible to reach a conclusion about the compliance of the proposal with Policy PS1 based on the lack of information, and due to the objection to the principle of the proposal as previously noted, this information was not sought.

## 6. Conclusions:

- 6.1 After considering all material planning matters in full, it is not considered that the application can be supported due to the proposal's impact on the landscape and nearby residents.

### Recommendation: Refuse.

To refuse – reasons

1. The proposed lodge site and associated works due to the number of units, their setting, design, sitting and appearance in the landscape, increase in the use of hardstanding areas, will result in a feature that is prominent and intrusive feature within the open countryside and would have a detrimental impact on the landscape and on the visual amenities of the rural area and lead to a significant intensification in the provision of permanent sites in the locality. The proposal is therefore contrary to criteria 1.i and ii. policy TWR 3 and policy PCYFF 3 of the Anglesey and Gwynedd Joint Local Development Plan (July 2017) and the Supplementary Planning Guidance: Holiday Accommodation.
2. The scale of the proposal would create excessive manoeuvres and general activities along the adjacent highway and within the site creating noise and disturbance to the detriment of nearby residential properties. The proposal is therefore considered contrary to policy PCYFF 2 of the Anglesey and Gwynedd Joint Local Development Plan (July 2017).
3. There is insufficient information in the form of details on the location and size of the drainage area as well as the results of the percolation tests in connection with the proposed Sewerage Treatment System. Therefore, the proposal is contrary to the requirements of policy ISA 1 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017), which ensures adequate infrastructure.
4. Insufficient information has been submitted with the application to note how consideration has been given to the Welsh language when drawing up the proposal. To this end, it is not possible to reach a conclusion regarding the proposal's compliance with Policy PS1 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017), as well as Supplementary Planning Guidance 'Maintaining and Creating Distinctive and Sustainable Communities' (adopted July 2017), relating to the Welsh language.
5. Insufficient information including a geophysical survey has been received as a part of the application, therefore, it is not possible to reach a conclusion about the proposal's compliance with policy AT4 of the Anglesey and Gwynedd Joint Local Development Plan (July 2017), which safeguards undesignated archaeological sites and their setting.