

Number: 3

Application Number: C17/0487/30/LL

Date Registered: 13/06/2017

Application Type: Full - Planning

Community: Aberdaron

Ward: Aberdaron

Proposal: Create a touring caravan site with six plots along with landscaping, building a toilet/shower block and installation of septic tank.

Location: Fferm Methlem, Rhydlios, Pwllheli, Gwynedd, LL538LG

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This is an application to establish a touring caravan site for six units on a field at Methlem, Rhoshirwaun. The proposal also involves constructing a toilet block to the rear of the existing workshop, along with installing a sewage treatment system and undertaking an element of landscaping to enhance existing hedges. The field in question is of a triangular shape, and it is proposed to site the units around the boundaries of this small field. There is a distance of approximately 110m between the field and the dwelling of Methlem, which are separated by a workshop, yard and outbuildings of varying quality.
- 1.2 This is a site in open countryside which abuts the Whistling Sands class three county road and is also located within an Area of Outstanding Natural Beauty (AONB) designation. The site is also located within a Landscape of Outstanding Historic Interest. It is intended to use a vehicular access that currently serves as an access to the workshop and the yard. At present there are a number of caravans and vehicles in the yard.
- 1.3 The application is submitted to the Committee as it involves a development of five or more caravans.

2. Relevant Policies:

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2.1.2 of Planning Policy Wales emphasise that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise. Planning considerations include National Planning Policy and the Local Development Plan.
- 2.2 The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the 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 **Gwynedd and Anglesey Joint Local Development Plan 2011-26 adopted 31 July 2017**
- TRA 2: Parking standards
 TRA 4: Managing transport impacts
 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: Protect and/or enhance natural environment
 AMG 1: Areas of Outstanding Natural Beauty Management Plans
 PS 17: Safeguarding and/or enhancing heritage assets
 AT 1: Conservation Areas, World Heritage Sites and Landscapes, Parks and Registered Historic Gardens.
- 2.4 **National Policies:**
 Planning Policy Wales (Edition 9, November 2016)

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Technical Advice Note 12 – Design
 Technical Advice Note 13 – Tourism
 Technical Advice Note 18 – Transport

3. Relevant Planning History:

- 3.1 C15/0110/30/LL - Creation of touring caravan site for six caravans, construction of toilet block and installation of sewage treatment system together with landscaping - Withdrawn 27 April 2015.
- 3.2 C09D/0188/30/LL Retrospective application to retain a workshop that was erected to replace previous workshop: Approved 17 November 2009
- 3.3 C08D/0133/30/LL Rear, side and front single-storey extension: Approved 19 May 2008
- 3.4 2/10/115A Convert old agricultural buildings into a holiday centre for the disabled and carer accommodation: Approved 29 October 1993 (Not implemented)
- 3.5 2/10/115 Change of use of two rooms into restaurant: Approved 8 May 1978

4. Consultations:

Community/Town Council: Not received.

Transportation Unit: `Proposal is of acceptable scale which is unlikely to have a detrimental impact on the local roads network.

Natural Resources Wales:

Foul Water Drainage

The proposal confirms the offer that foul water from the caravan site will be disposed of by installing a new private sewage treatment works. As it is a caravan site of seasonal nature, and if there is no other sewage source used throughout the year connected to the sewage treatment work, this system would not treat any sewage over the winter period. If so, when the tourist season resumed, the sewage treatment work would need assistance to re-start in order to comply with any exceptions or licence issued.

The applicant would need to provide information to confirm:-

- Installing a septic tank which drops into a soakaway has been considered - in terms of sewage treatment hierarchy, it would be beneficial for the applicant to consider if the land is suitable to install a septic tank and soakaway as these would cope better with the increase and reductions in sewage loads. We recommend the applicant to carry out a mandate test to discover if the land conditions are suitable for a septic tank and soakaway.
- The private sewage treatment works' drop method - The application submitted does not confirm the sewage treatment works' drop method. We would have significant concerns in regards to releasing sewage into the pool in Methlem, as it would lead to eutrophication and polluting the pool and

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watercourses leading to the river. This means of disposing sewage effluent is therefore unsuitable.

- The chemical toilet disposal point is not connected to the foul water drainage system. The applicant should correct the means of draining foul water which is associated with the disposal of sewage and chemicals.
 - The designs also note that a chemical waste disposal point is proposed for the site. It is recommended that it should be connected to the sewage treatment works. Chemical toilet waste should not be permitted to be drained to any private sewage treatment works as the associated chemicals would kill the bacteria living in the sewage treatment works, and the quality of effluent produced would be poor as a result of this. Waste from chemical toilets should be collected within a sealed tank (with a loud alarm), before being emptied by a tanker and transferred to one of Welsh Water's sewage treatment works, which is of appropriate size and can cope with such an influx.

Advice was also given in terms of the environmental management of development works, and noting that the site is within the AONB.

Welsh Water: As the applicant intends to use a private sewage works, it is recommended to contact Natural Resources Wales.

Biodiversity Unit: The proposed area for the caravans contains an area of grassland. There is a hedge on the boundary with the road. There is a pool nearby to the north of the proposed site for caravans. The applicant has not submitted any ecological reviews i.e. for habitats or priority species, nor have they submitted an Ecological Impact Assessment. A trees report has also not been submitted. However, the proposal is unlikely to have an effect on biodiversity and trees, and I have no objection to the proposal. The *cloddiau* are a habitat of high biodiversity value and are a characteristic element of Llŷn's landscape. I suggest a planning condition to safeguard the *clawdd* is included.

AONB Unit: Methlem is in a prominent position on a rural roadside in the area of Rhydlios and within the AONB. The site in question is located between the road and a relatively substantial agricultural building. Nearby, there are traditional agricultural buildings in a dilapidated and ragged condition. The existing *clawdd* and hedge offer an element of screening, however the development would be visible from the road and some other locations, and in terms of the AONB, there is concern about establishing a new touring caravan site here.

Caravans Officer: A site licence is required for this development. It is noted within the application details that the space between touring caravans would vary, depending on the order the touring caravans would enter the site and shape and character of the site. This could have an impact on fire safety if the touring

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units (caravan + awning + car) where too close to the nearby unit. It is required to have three clear metres between every touring unit (caravan + awning + car + three clear metres). Due to this issue, fewer caravans should be considered within the planning permission unless a specific confirmation is received that there is enough room for the six touring caravans. It is also noted that there are currently cars, a JCB and agricultural equipment parked close to the agricultural shed. It must be ensured that no unnecessary equipment or transportation are on the site which could cause danger to the health and safety of the Public. The site must be kept clear of any structures, sheds or wooden decking which could create clutter and increase fire risks.

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

Public Consultation: A notice was placed on the site and the consultation period came to an end. No response was received during the public consultation period.

5. Assessment of the material planning considerations:

The principle of the development

- 5.1 Policy TWR 5 LDP permits proposals to develop new touring caravan sites provided they conform to all the criteria noted. These include the need for the proposed development to be of a high quality in terms of design, layout and appearance and sited in an unobtrusive location which is well-screened by existing landscape features and/or where touring units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; avoids excessive areas of hard standing; have limited physical connection to the ground and is capable of being removed off the site out of season; any ancillary facilities should, if possible, be located within an existing building or as an extension to existing facilities; that the site is close to the main highway network and that adequate access can be provided without significantly harming landscape characteristics and features; occupation is limited to holiday use; that the site is used for touring purposes only and any units are removed from the site during periods when not in use.
- 5.2 The small field in question lies in open countryside and is adjacent to a class three county road. The six units would be sited around the boundaries of the field, which is in triangular formation. Criterion 1 of policy TWR 5 states that the design, layout and appearance of touring caravan sites should be of a high quality. As the size of this field is limited, it is questioned whether it is possible to have a setting of a high standard. It appears from the plan that the units will be packed into a small site, with parking and possible awnings between these units meaning that the amenity area will be very limited for the users. The Caravan Officer's comments also question if there is sufficient space for the number of units applied for within the site. It can be seen from the plan submitted that there would not be sufficient space between the units to conform to Caravan Officer's requirements for a caravan, awning and then three clear metres to the next plot.
- 5.3 There are no significant concerns about the toilet block element of the application, as it is intended to finish the toilet block to blend in with the existing workshop which is of a dark green colour. Although a *clawdd* of varying height acts as a boundary with

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the road, with a few small trees here and there, the current landscaping is not sufficient to conceal or integrate the proposed units in the landscape. While it is noted that the scheme states that it is intended to strengthen the existing hedges on the southern boundary, it was noted during the visit that this southern boundary is generally not landscaped and there is only a low hedge here. The fields beyond this site are open with a slope running down from the application site to a southerly direction, meaning that there are clear views of the units from the county road from the direction of Whistling Sands.

- 5.4 The Design and Access Statement submitted with the application has viewed the site from various locations in the vicinity. On the whole, the assessment of these sites recognises that the site is visible and recommends additional landscaping to create a screen for the site. The plans submitted as part of the application include additional landscaping along the site's boundaries with the county road as well as along the southern boundary. These have been included as mitigation measures for the proposed development. Despite the landscaping proposal, the policy states that new sites should be in unobtrusive locations and effectively concealed by existing landscape features. In its current form, the site does not satisfy this criterion as the site is prominent in the landscape, therefore the proposal is considered contrary to the main principle of policy TWR 5 of the Development Plan.
- 5.5 In respect of proximity to the road network, the site has direct access to a third class county road. It is a rural road that is narrow and winding in parts, however, the yard has a wide access with relatively open visibility to all three directions.
- 5.6 Caravan storage does not form part of this application, however it was noted during the site inspection that a few caravans are already being stored near the current workshop. It is understood that the Enforcement Unit has looked into the storing previously and that no further action was taken as the applicant undertakes vehicle and caravan repairs and keeps them there for his business. No information has been included in the application that offers assurance that the touring units that form part of the application will be moved when not in use, otherwise, this would have implications on visual amenities. It would however, be possible to place a condition of no storing caravans on the site.
- 5.7 There is no other touring caravan site near the application site, or in the same visual context, therefore there are no significant concerns regarding the cumulative impact of existing sites in this case. Nevertheless, it is not considered that the proposal meets with the main objective of the policy which asks for sites to be unobtrusive in the landscape therefore it is considered that the principle of the proposal is contrary to policy TWR 5 of the LDP.

Visual amenities

- 5.8 The main aim of policy AMG 1 of the LDP is to conserve, maintain and enhance the character of the Area of Outstanding Natural Beauty by giving consideration to the Area of Outstanding Natural Beauty Management Plan. One of the main goals of the AONB Management Plan is to sustain, safeguard and improve the character, outstanding beauty and uniqueness of Llŷn's landscape, coast and seascape. To this end, the Management Plan includes many Policies and Objectives. The TP4 Policy and TA 4 Objective attempt to resist developments that would be intrusive in the landscape, coast or seascape of the AONB. Policy TP5 and TA 5 Objective of the Management Plan recommend resisting new caravan developments and extensions to existing sites in prominent locations within the AONB and promote landscaping and improved management of existing sites and units. As already noted, there is concern

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that the site in its current form is intrusive in the landscape, as the existing landform and landscape do not assimilate the units within their location. It is considered that the site is prominent in the landscape as it is, with the number of vehicles, machinery and equipment within the yard visibly attracting attention and standing out. Approving a caravan site on this site would add to the prominence of the site and would detract from views within the AONB, which are very conspicuous from the direction of the road near Whistling Sands and also when travelling towards Methlem from the direction of Rhydlios. The proposal would not contribute positively to the broader landscape of the AONB and therefore the proposal does not meet the requirements of policy AMG1 of the LDP.

- 5.9 The current landform and landscaping are not sufficient to assimilate the units with the site. Although the plans show that it is intended to strengthen the existing landscaping by screening the caravans, no comprehensive landscaping details have been included with the plans. Should the application be approved, there is no assurance that the planting would be carried out to the extent that would be necessary to screen the development. The application itself recognises that the current landscaping is insufficient and despite the proposed landscaping, it is not considered that the proposal in essence is acceptable in the context of the landscaping policy of PCYFF 4 of the LDP, given its sensitive location within an AONB.
- 5.10 The site lies within the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest. The proposal relates to creating a new touring caravan site, but in terms of its location and size, it is considered that the impact of the proposal would be local only and that it would not have a broader impact on the historic landscape. It is considered therefore that the proposal is acceptable in terms of Policy AT 1 LDP.

Transport and access matters

- 5.11 The site is served by a third class rural road, which is narrow and winding in parts near the site. It is not a busy road in terms of traffic, however, it is a road that serves the beach of Whistling Sands and therefore experiences a high level of traffic during the summer season. The Transportation Unit has no concerns regarding the proposal. The access is wide and has sufficient open visibility to all three directions, therefore it is not considered that the proposal is likely to be damaging to road safety or contrary to policy TRA 4. It is intended to park visitor vehicles between the units, which is acceptable in terms of Policy TRA 2, but means that the site's amenity space will be limited.

Biodiversity matters

- 5.12 Observations were received from the Biodiversity Unit on the application. They do not have any biodiversity concerns about the application, but do ask for a condition that the *clawdd* is preserved. In this respect, it is considered that the proposal is acceptable in terms biodiversity matters.

Other matters

- 5.13 As part of the application it is intended to install a new private sewage treatment works. Natural Resources Wales' observations voice opposition to the intention and basis of using this type of system. It is understood that this type of system is not ideal for seasonal use as in this case for the touring caravan site and that the applicant should consider if the land is suitable to install a septic tank and soakaway as these would cope better with the increase and reductions in sewage loads. If it can be shown that the land is unsuitable for a septic tank, it would then be possible to

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consider a private sewage treatment works, but there is concern that sewage would be released into the pool in Methlem leading to eutrophication and polluting the pool and watercourses leading to the river, therefore this means of disposing sewage effluent is unsuitable. A chemical waste disposal point is also proposed for this site which would be connected to the sewage treatment works. However, Natural Resources Wales states that chemical toilet waste should not be permitted to be drained to any private sewage treatment works as the associated chemicals would kill the bacteria living in the sewage treatment works, and the quality of effluent produced would be poor as a result of this. Natural Resources Wales sent a copy of its observations to the agent, but no response was received responding to the points raised when preparing the report. The agent was contacted again to try to seek their response. Currently therefore, sufficient information about the means of sewage disposal has not been received as part of the application to show that the proposal would not cause pollution mainly to the aquatic environment. It is therefore considered that the proposal does not comply with criterion 7 of Policy PCYFF2 which states that proposals that would have a significant detrimental impact on health, safety or amenities of the owners of local property, land materials or other property or the features of the local area due to an increase in activities, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution or other forms of disturbance or pollution, should be refused.

6. Conclusions:

- 6.1 Although this would be a small touring site, in terms of size and number, the Council has not been convinced that the site, in its current form, complies with the principles of policy TWR 5 which relates to touring sites. It is considered that six additional caravans would be an intrusive feature in the landscape and would lead to an unacceptable harmful effect on the Area of Outstanding Natural Beauty. The existing vehicles and equipment on site currently stand out in the landscape and the proposed units would exacerbate the situation. Despite the proposed landscaping, there is no assurance that the landscaping would take place should the application be granted, and even so, concerns would remain in terms of the visual impact of the proposal. Whilst it is noted that there are no concerns based on highways or local amenities, the main principles of policy TWR 5 are not met, as the units would not be assimilated within the existing landscape within the AONB where the main aim is to conserve, maintain and improve its character. In addition, sufficient information about the means of sewage disposal has not currently been received as part of the application to show that the proposal would not cause pollution mainly to the aquatic environment, therefore the proposal is contrary to criterion 7 of Policy PCYFF 2.

7. Recommendation:

- 7.1 To Refuse – reasons
1. The proposed caravan site, due to its location, setting and appearance in the landscape, would stand out as a prominent and intrusive feature in open countryside and would have a detrimental impact on the landscape and on the visual amenities of the Area of Outstanding Natural Beauty. The proposal is therefore contrary to policy AMG 1 and TWR 5 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017) (as amended by the Inspector's Report, 30 June 2017) and the Supplementary Planning Guidance: Holiday Accommodation, Gwynedd Council.
 2. Sufficient information has not been submitted about the means of sewage disposal from the site to ensure that the proposal would not cause pollution mainly to the aquatic environment, therefore the proposal is contrary to criterion 7 of Policy

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PCYFF 2 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017)
(as amended by the Inspector's Report, 30 June 2017)