

<b>PLANNING COMMITTEE</b>	<b>DATE: 22/03/2021</b>
<b>REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE</b>	

**Number: 4**

**Application Number: C20/1020/39/LL**

**Date Registered: 02-12-2020**

**Application Type: Full**

**Community: Llanengan**

**Ward: Abersoch**

**Proposal: To relocate seven caravans with the curtilage of an existing caravan site.**

**Location: Rhandir Caravan Park, Lôn Plas Crwth, Mynytho, Pwllheli, LL53 7SF**

**Summary of the Recommendation: APPROVE WITH CONDITIONS**

<b>PLANNING COMMITTEE</b>	<b>DATE: 22/03/2021</b>
<b>REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE</b>	

## **1. Description:**

- 1.1 The proposal involves changes within an existing static caravan site, namely the relocation of seven caravans from their current locations that are spread across the site to a single location in the southern area of the site, adjoining existing land used as a park and dog exercise field. The proposed improvements would include the construction of a 1m high earth bank with hedgerows along its top, alongside the units in their new location. In addition, there is an intention to undertake landscaping and planting within the plots that become vacant within the site once the units are relocated. The current planning permission on the site is for 62 static caravans, and as the proposal involves the relocation of seven existing caravans, the actual number of caravans would remain the same.
- 1.2 The site is located in the countryside within the designations of the Western Llŷn Special Landscape Area and the Llŷn and Bardsey Landscape of Outstanding Historic Interest. Access to the site is gained along a private road off the closest public class road. The road leading to the site also serves as a public footpath. There are established hedgerows along the site's perimeters and within, in addition to a scattered growth of trees.

## **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 seven well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

### **2.3 Anglesey and Gwynedd Joint Local Development Plan 2011-2026, adopted 31 July 2017**

Policy PS 1: The Welsh Language and Culture

Policy TRA 2: Parking standards

Policy TRA 4: Managing transport impacts

Policy PS 5: Sustainable development

Policy PCYFF 2: Development criteria

Policy PCYFF 3: Design and place shaping

Policy PCYFF 4: Design and landscaping

Policy PS 14: The visitors' economy

Policy TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping

<b>PLANNING COMMITTEE</b>	<b>DATE: 22/03/2021</b>
<b>REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE</b>	

Policy AMG 2: Special landscape areas

Policy PS 19: Conserving and enhancing the natural environment where appropriate

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

POLICY PS 20: Preserving and where appropriate enhancing heritage assets

Also relevant in this case are the following:

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

SPG: Tourist Facilities and Accommodation

SPG: Character of the landscape

#### 2.4 **National Policies:**

Planning Policy Wales, Edition 11 2021

Future Wales: The National Plan 2040

Technical Advice Note 12: Design

Technical Advice Note 13: Tourism

Technical Advice Note 20: Planning and the Welsh Language

### 3. **Relevant Planning History:**

3/4/153 - Siting of 15 caravans - Approved 04.05.64.

3/4/153A - Proposed facilities - Approved 24.05.64.

3/4/153B - Siting of 12-15 additional caravans - Approved 13.04.65.

3/4/153C - Extension to facilities - Approved 22.10.65.

3/4/153D - Siting of 10 additional caravans - Approved 22.03.66.

34/6/153E - Siting of 17-22 additional caravans - Approved 12.05.69.

34/64/153F - Construction of telephone kiosk - Approved 20.04.72.

2/19/669 - Siting of six additional caravans - Refused 01.03.90.

C12/1424/39/11 - Extension of static caravan site for improvements including the relocation of existing units and landscaping - approved 07.12.12

PLANNING COMMITTEE	DATE: 22/03/2021
REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE	

#### 4. Consultations:

Community/Town Council: Support

Transportation Unit: No observations

Natural Resources Wales: No observations

Welsh Water: Standard response

Public Protection Unit: Standard advice including confirmation that there would be sufficient width between the units to satisfy relevant licensing conditions

Public Consultation: A notice was posted on the site and nearby residents were notified. The advertising period has ended and no correspondence has been received.

#### 5. Assessment of the material planning considerations:

##### 5.1 The principle of the development

The main policy to consider when assessing the proposed development is policy TWR 3. This policy is restrictive in terms of developments to create new static caravan sites within areas such as Areas of Outstanding Natural Beauty and Special Landscape Areas. In this case, the site lies outside of the AONB but within the Western Llŷn Special Landscape Area. Consideration must therefore be given to part 3 of the policy, which states that:

*"proposals to improve existing static and chalet sites by:*

*i. minor extensions to the site area, and/or*

*ii. the relocation of units from prominent settings to less prominent locations, will be permitted providing all of the following criteria can be met:*

*iii. the improvements do not increase the number of static caravan or chalet units on the site unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management Area;*

*iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;*

PLANNING COMMITTEE	DATE: 22/03/2021
REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE	

- v. In the case of a site located within the Coastal Change Management Area, that the proposed development is also part of a scheme to improve the safety of occupiers of caravans or chalets;*
- vi. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;*
- vii. is appropriate when considered against other policies in the Plan".*

Criterion i: The proposal relates to the relocation of seven static caravans from their existing locations, scattered across the site, to a single location in another part of the site. On the basis of a full assessment undertaken for the site, it is not believed that the proposal would extend the existing caravan site as it is land that is already located between the existing units and leisure fields used as part of the existing site; therefore, it is not thought that the surface area of the site is being increased.

Criterion ii: It could be argued that the location of the proposed development is more prominent than the locations of some existing units as the predominant landscape is grassland without permanent features. However, some of the existing units are located in prominent positions and by including landscaping measures such as the new bank, views from the south would still be protected. Removing the unit from plot 1 certainly offers an improvement, as it is directly adjacent to the site entrance. Removing the units from plots 49-53 would also be an improvement as this area of the site currently appears crowded; opening up this land would improve views from the north. It is believed that this is also true of the other plots that are to be vacated, as doing so allows the relocation of some of the closest existing caravans, thus opening up additional space between the units and creating a less crowded appearance in the general area. There are benefits to be seen from opening up existing areas of the site, allowing additional landscaping within the site, and enabling caravans to be sited further apart from one another. The caravans are currently located relatively close to one another in some places, and it is considered that the proposal would attempt to improve the range and quality of the site. Therefore, on balance, it is not believed that relocating the units would be contrary to the requirements of criterion ii.

Criterion iii: The proposal does not increase the number of units on the site; relocating existing units on plots 1, 13, 28, 50, 51, 52 and 53 to a location together does not increase the total for the whole site. In order to ensure this, a condition is attached which restricts the number to the current permission for 62 units and in addition, a condition is applied to ensure that the plots that are vacated are appropriately landscaped and that no type of structure is located on those sites in the future.

Criterion iv: As already noted above, it is believed that vacating the current plots is an improvement to the general range of the site and is certain to improve the quality of the closest units, which will benefit from having additional space around them. The result of these changes would be an improvement in the quality of the existing caravan park by opening up plots and areas of the current site as well as creating new locations for the seven units; these would be of a high standard and would improve the quality and range of accommodation for site users. It is therefore considered that the proposal is acceptable in terms of criterion iv.

PLANNING COMMITTEE	DATE: 22/03/2021
REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE	

Criterion v: This criterion is not relevant in this case as the site is not within a Coastal Change Management Area.

Criterion vi: The proposal includes the construction of a 1-metre high earth bank with hedges along its top along the boundary of the seven units and the existing leisure area. In addition, there is an intention to undertake additional landscaping, including the plot near the entrance to the caravan park, and landscaping areas of the site that become vacant following relocation. Currently, the site is fairly concealed from the south, west and east. The site would be visible when traversing a nearby public footpath, and it is also visible in distant views to the north of Mynytho. It is therefore considered that the proposed landscaping would be of assistance to reduce the impact of the caravan park on the landscape, which is also a landscape conservation area. It is also considered that the proposed improvements would improve the appearance within the site as moving some caravans would open up parts of the site and would allow more landscaping within the site. It is considered that the proposal complies with the requirements of criterion vi.

Criterion vii: Consideration will be given to other relevant policies of the Plan in the remainder of the assessment below.

## 5.2 Visual, general and residential amenities

As already noted above, it is not considered that the proposal to relocate seven existing caravans within a static caravan site would have a detrimental impact on the visual amenities of the area to a greater extent than the current situation, and the landscaping plans offered as part of the proposal would be of assistance to reduce the impact of the existing site on the landscape. Although some details are provided with regard to the proposed landscaping within the site, specifically planting hedgerows of thorns and other native species as well as planting trees, it is thought reasonable that a condition should be included to agree upon the actual details of the landscaping, and for the proposed planting to be protected with an additional condition stating that any damaged plants should be replaced within a specified period.

Based on all material considerations, it is believed that the proposal is acceptable in terms of the relevant requirements of policies PCYFF 2, PCYFF 3 and PCYFF4.

There are no residential houses close to the site, and its rural location is far from any nearby settlements. It is not believed that relocating seven existing units, keeping within the established boundaries of the caravan site, would increase the site's impact on the area's general amenities to a greater extent than what already exists. The site has been established and operates as a caravan park, which means that this is not a development for completely unused greenfield land; consequently, it is believed that the proposal is acceptable in respect of the requirements of policy PS 5. It is therefore believed that the proposal in its entirety is acceptable based on the relevant requirements of policy PCYFF 2.

The site is located within the designations of the Western Llŷn Special Landscape Area and the Llŷn and Bardsey Landscape of Outstanding Historic Interest. The proposal involves a small change to the current situation, and with use of appropriate landscaping measures, it is not believed that the site's appearance would become more prominent than it is currently within these areas. Therefore, it is not believed that the proposal would cause harm to the registered designation and consequently, it is in accordance with the relevant requirements of policies PS 19, AMG 2, PS 20 and AT 1.

PLANNING COMMITTEE	DATE: 22/03/2021
REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE	

### 5.3 Matters relating to transportation and access

Policies TRA 2 and TRA 4 involve assessing proposals in terms of their impact on parking standards and sustainable means of transportation. It is acknowledged that this site is in a rural location and that it is very likely that a vehicle will be needed to visit the site. Nevertheless, there is an established use in this case and specifically, the proposal involves rearranging the internal layout of the site rather than new developments or increasing the site capacity. The private road serves the site from the class 3 county road. As there is no intention of increasing the number of caravans, it is not believed that the proposal is likely to have a detrimental impact on road safety that is greater than what already exists. The Transportation Unit has no concerns regarding the proposal in terms of road safety. It is considered that the proposal is acceptable in terms of TRA 2 and TRA 4.

Public footpath 55 Llangengan is located near the site, by the entrance road to the site. It is not considered that the proposal would affect this public footpath as it involves refurbishment within the site itself rather than at any location that would have an impact on this path.

### 5.4 Linguistic matters

The proposal does not reach the thresholds set within policy PS1: The Welsh Language and Culture, to provide a language statement. As this is a Committee application, the SPG for 'Maintaining and Creating Unique and Sustainable Communities' requires applicants/agents to provide a statement to explain how the proposal considers the language. Officers have requested and have received a statement.

In summary, it notes as follows:

- There is no intention to install new signage directly as part of this application, as it only involves internal rearranging. However, the owners have already been taking down old signs, and the new signage is bilingual. This enriches the customers' stay, and draws attention to the Welsh language's prominent status within the region.
- The proposal was considered against Policy PS1 criteria 4 and 5, and this was considered to be an amendment to a plan already approved in 2012 (*C12/1424/39/LL*), where there has been no change to the number of plots.
- Consideration was also given to the fact that the tourism industry is steadily growing as an attraction for Welsh speakers within both counties and beyond, and that there is an increasing expectation for the provision to recognise the status of the Welsh language in the area.
- It was also considered that the standard and quality of the experience of visiting this part of the world involved an increasing expectation for the Welsh language to be prominent and ever-present, as it gave further validation to the character and nature of that experience.
- Following consideration given to the impact on a sufficient, sustainable and robust community, the proposal, therefore:
  1. continues to provide local families with an income
  2. continues to bring in spending money for local businesses
  3. fits in with its location in a neat and concise manner
  4. mitigates the impact on the holiday homes market. Consequently, it is suggested that the proposal has no detrimental impact on the area's Welshness - but rather is a possible tool for its reinforcement - in accordance with Council Policy criteria.

<b>PLANNING COMMITTEE</b>	<b>DATE: 22/03/2021</b>
<b>REPORT OF THE SENIOR MANAGER PLANNING AND PUBLIC PROTECTION SERVICE</b>	

- Appropriate consideration was given to the Welsh language within the Language Statement submitted. In accordance with the arrangements for screening applications included in Appendix 5 of the 'Maintaining and Creating Distinctive and Sustainable Communities SPG', it is noted that specific criteria CH1 and CH2 are satisfied in light of the information submitted.
- It is therefore believed that appropriate consideration has been given to the Welsh language, that the proposal has been thoroughly assessed against the relevant requirements, and that it is acceptable in terms of the relevant requirements of policy PS1 in addition to the advice given within the relevant SPG.

## **6. Conclusions:**

- 6.1 The proposal here is to undertake changes within the existing boundary of the caravan site in order to relocate seven caravans from their current locations. A series of improvements are offered within the proposal, including the construction of an earth bank and landscaping works. It is considered that the proposal is reasonable and that it would not have a detrimental effect on the visual amenities of the area or the registered landscapes. Having considered the above and all the material planning matters including the local and national policies and guidance and all observations received, it is believed that this proposal is acceptable and complies with the relevant policies as noted above.

## **7. Recommendation:**

- 7.1 Approve – conditions

1. Time
2. Comply with plans
3. Landscaping
4. Restrict the units to holiday use
5. Restrict plot use / restoration plan
6. Restrict the numbers