

PLANNING COMMITTEE	DATE: 07/09/2026
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 2

Application Number: C26/0216/30/LL

Date Registered: 07/04/2026

Application Type: Full

Community: Aberdaron

Ward: Pen draw 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, creation of proposed entrance/exit and installation of a treatment plant

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

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This is a full application relating to the extension of an existing caravan site to nearby agricultural land. It is proposed to create additional formal plots to an existing site for 10 seasonal touring caravans along with the erection of a 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 to the rear of the proposed toilet block. There is an existing hedge along 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 and within the Llŷn AONB. It is also located within the Llŷn and Enlli Landscape of Outstanding Historic Interest, and partly within Flood Zone 2/3 (Surface Water and Small Watercourses), as shown on the Flood Map for Planning. 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. It is noted that this proposal has been the subject of a planning application under reference C24/0413/30/LL which was withdrawn by the applicant prior to its submission to the Planning Committee on the 30.09.2024.

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.

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2.3 Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017

TRA 2: Parking standards

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 15: Development, flooding and coastal erosion.

Technical Advice Note 18: Transportation

3. Relevant Planning History:

- 3.1 C24/0413/30/LL - 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, creation of proposed entrance/exit and installation of treatment plant - Withdrawn - 30-09-2024

This application was withdrawn prior to the Committee with a recommendation to refuse.

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- 3.2 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
- 3.3 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
- 3.4 Application 9900073FUL10 – Storage of touring caravans – Approved 17/01/00
- 3.5 Application 2/10/134A: Site for 30 touring units - Approved 28/03/96
- 3.6 Application 2/10/134C: Construct toilet and washing facilities block for touring caravans - Approved 09/08/94
- 3.7 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 was 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
Highways Unit:	Concerns have been raised in relation to the main entrance to the proposed site. In particular, it is considered that there is potential for mud and loose material to be spilled onto the public highway, along with the possibility of damage to the roadsides as a result of the increase in traffic using the entrance. In order to mitigate these impacts and in the interests of highway safety, we ask the applicant to upgrade the entrance to an appropriate and satisfactory standard and provide details of the proposed works. In view of the requested improvements to the main entrance, we also request that the second entrance be

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restricted to pedestrian and emergency services vehicle use only. This will help manage traffic movements in and out of the site, ensuring that all normal traffic uses the upgraded main entrance. I confirm that the Transport Service objects to the application as currently submitted, in order to be able to receive and evaluate additional information in relation to the proposed scheme.

Welsh Water:

No response

Land Drainage Unit:

The site of the proposed development is partly located within Flood Zone 2/3 (Surface Water and Small Watercourses) as shown in the Flood Map for Planning. It is suggested that the developer considers the removal of the lowest two plots to an area beyond the boundary of the flood zone. Otherwise, in accordance with TAN 15 section 6.1 the developer is required to present a Flood Consequence Assessment (FCA) which demonstrates that the proposed development is not at unacceptable risk of flooding from surface water sources, and that suitable measures are included to increase resistance and resilience of the development to flooding.

Following a review of the submission, it was noted **that no drainage strategy** has been provided as part of the application documentation. The provision of a drainage strategy is required in accordance with technical advice note (TAN) 15: development, flooding and coastal erosion. As a result, it is not possible to assess compliance with national sustainable drainage standards, or to determine how surface run-off will be managed on site.

Under Schedule 3 of the Flood and Water Management Act 2010, any development comprising one or more dwellings or a construction area of 100m² or more must obtain SAB approval prior to construction.

Please see below a summary of the SuDS surface water destination hierarchy and the information required at this stage depending on the option selected. Evidence ruling out higher priority options must be provided before a lower priority can be accepted.

SuDS Surface Water Destination Hierarchy

Priority 1: Rainwater Harvesting

Due to the nature of the development, we acknowledge that full rainwater harvesting is unlikely to accommodate all site run-off. However, if there is potential for partial rainwater reuse - such as through the installation of water butts at

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downpipes — we encourage their inclusion to support the use of harvested rainwater for non-potable purposes.

Priority 2: Infiltration

- Infiltration testing must be carried out in accordance with BRE365. We require an infiltration test report showing timestamps for three tests conducted in a trial pit located where the proposed soakaway would be. The pit depth must reflect the proposed soakaway and be filled with sufficient water to replicate conditions. The three tests should be performed in close succession.
- We will need a trial pit location plan and photos of any trial pits.
- Additionally, groundwater monitoring is required. A minimum 1-metre clearance must be maintained between the base of the soakaway and the highest groundwater level to prevent ingress, which could reduce system capacity.

Priority 3: Watercourse

- If infiltration is proven unfeasible, discharge to a watercourse may be considered. This must be at greenfield run-off rates, requiring attenuation and flow control measures. If no watercourse is reasonably accessible, proceed to Priority 4.

Priority 4: Surface Water System

- Discharge rates must be agreed with the system owner. If no surface water sewer is within reasonable proximity, proceed to Priority 5.

Priority 5: Combined Sewer

- Comprehensive evidence must be provided to justify dismissal of all higher-priority options. Due to capacity constraints, Welsh Water are reluctant to accept surface water connections.
- If an existing connection exists (e.g., a property is being demolished and rebuilt), the applicant must demonstrate that the new development will improve flow rate and volume.
- If no existing connection exists, Welsh Water are unlikely to accept a new one.

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- If the proposal involves connecting to Welsh Water's system, we strongly advise contacting them at the earliest opportunity to avoid delays in processing the application.

Due to the lack of evidence provided, we strongly encourage the applicant to contact the SAB for a pre-application discussion. Until more information and evidence is provided, we offer a holding objection.

The proposed development site appears to be partly located within the Flood Zone 2/3 (Surface Water and Small Watercourses) as shown in the Flood Map for Planning. We recommend that the developer consider the removal of the lowest two plots to an area beyond the boundary of the flood zone.

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Licensing Unit:

The development will be subject to the following Legislation relating to Health and Safety, Fire Safety and Public Health provision as follows:

The Health and Safety at Work etc. Act 1974

The Caravan Sites and Control of Development Act 1960

Model Standards 1983 - Touring Caravans / Tents

The development must fully comply with licence conditions.

www.gwynedd.llyw.cymru/caravanlicence

Application for a Site Licence following planning application approval

We wish that this information is reported on the planning permission if the application is approved:

'Following any planning application permitted in relation to a caravan or camping site under the 1960 and 1936 Acts, the applicant would be required to make an application for a site licence and present a 1:500 scale detailed plan of the site to the Licensing Service. To discuss further, you can contact the Licensing Enforcement Officer, Pollution Control and Licensing Service, Cyngor Gwynedd on 01766 771000 or licensing@gwynedd.llyw.cymru'

Boundary - Hedges

Licensing conditions recommend a width of 3 metres from any boundary / hedge.

Emergency Vehicles – Model Standards 1983 – Condition 2.3

Emergency vehicles need appropriate access, within 90 metres of any unit on the site on every occasion in accordance with the licence conditions. There are no details

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demonstrated within the site plan confirming the distance of access for emergency Services to every unit in any emergency.

Toilet facilities, bathrooms, showers, disabled bathrooms

No information is displayed within the site plan, indicating the disabled provisions (toilet, wash basin, shower) within the planning application.

North Wales Fire and Rescue Service

We trust that a consultation will be held with the North Wales Fire and Rescue Service on matters outside licensing conditions (1983 Model Standards).

Car Parking

Location of parking must be demonstrated.

This development will be subject to the Legislation stated below relating to Health and Safety, Fire Safety and Public Health provisions as follows:

Health and Safety at Work etc Act 1974

The Caravan Sites and Control of Development Act 1960

Model Standards 1983 -Touring Caravans / Tents

The development must comply fully with the licence conditions

www.gwynedd.llyw.cymru/caravanlicence

Application for a site Licence following planning approval

We wish that this information is stated on the planning permission should this application be successful:

‘Following any planning application that is granted in relation to a caravan or tent site under the 1960 & 1936 Acts, it will be necessary for the applicant to apply to amend the site license and submit a detailed 1:500 scale plan of the site to The Licensing Service. To discuss further, contact the Licensing Enforcement Officer, Pollution Control and Licensing Service, Gwynedd Council on 01766 771000 or licensing@gwynedd.llyw.cymru’

Boundaries - Hedges

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Licence conditions recommend that caravans are located 3 meters away from any boundary / hedge.

Emergency Vehicles - Model Standards 1983 – Condition 2.3

Emergency vehicles should be able to secure access to within 90 metres of any unit on the site at all times according to licence conditions. There are no details demonstrated within the site plan confirming the distance of access for emergency Services to every unit in any emergency.

Toilet, washing facilities, showers, provision for disabled

No information is displayed within the site plan, indicating the disabled provisions (toilet, wash basin, shower) within the planning application.

North Wales Fire & Rescue Service

We trust that a consultation will be made with North Wales Fire and Rescue Service on matters that are not part of the Model Standards 1983).

Parking

Location of parking must also be demonstrated

Biodiversity Unit:

This application is for the change of use of an agricultural field to include 10 seasonal touring caravan pitches.

The applicant has included a green infrastructure statement and a PEA from Cambrian Ecology.

The improvements are suitable for the scale of the development and have been included within the planning design; I have no ecological concerns.

Natural Resources Wales:

We have concerns regarding the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek more information from the applicant regarding protected sites. If this information is not provided, we will object to this planning application. Further details are provided below.

Protected Sites

Special Area of Conservation (SAC)

The site is located approximately 560m from the Sea Cliffs of Llŷn SAC and 630m from the Pen Llŷn a'r Sarnau SAC

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and the West Wales Marine SAC. Our records show that a small watercourse runs on the eastern red line boundary of the application site and is hydrologically connected to the above sites.

Foul Drainage

We have concerns that a likely significant impact of the proposed development on the SAC sites cannot be ruled out. Our advice is that you submit further information so that 2 of 6 can adequately consider the potential impacts on the features of the protected sites and, in particular, to enable your authority to carry out a Habitats Regulations Assessment under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

We note that the development proposes the installation of a private sewage treatment system (STCP). However, the method of discharge proposed is currently unclear and requires clarification from the applicant. We recommend that the applicant demonstrates that a discharge to the ground is not feasible.

If discharge to the ground is proposed, the applicant should provide further details on:

- The precise location of the discharge/drainage field
- Results of porosity (percolation) testing
- The dimensions and design of the proposed drainage field to confirm ground conditions are suitable for a drainage field

It is also noted that a spring is identified on one of the submitted plans. The drainage field should not be located in close proximity to this feature, and confirmation of appropriate separation distances is required.

Should a discharge to watercourse be justified, the exact discharge location will be required and clearly indicated on a map. In addition, as the receiving watercourse is classified as minor/unknown, further information would be needed to demonstrate that it has sufficient capacity to accommodate a discharge of this nature and volume, should the scheme propose discharging to the watercourse.

In addition, there is no information demonstrating how/where waste from the touring caravans is disposed of. Private sewage treatment systems

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(STCP) are not suitable to deal with chemical waste from caravans. A Chemical Disposal Unit (CDU) must drain into a sealed tank or cesspit, as the toxic nature of the effluent means that this cannot be discharged to ground or a watercourse. We would strongly recommend that such a sealed tank/cesspool is fitted with a level alarm to prevent overtopping.

Small sewage treatment works that meet certain criteria may be registered as exempt. A step-by-step guide to registering an exemption can be found on our website.

If the private sewage treatment system is not eligible for an exemption, the applicant will need to apply for an environmental permit. Further details on this can be found here. Should a permit be required, further information may be needed 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 advice service can be found here.

Habitats Regulations Assessment

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/SPA/Ramsar site.

Site of Special Scientific Interest (SSSI)

The application site is hydrologically linked to the Glannau Aberdaron SSSI located 560m from the application site.

We consider the proposed development has the potential to damage the Glannau Aberdaron SSSI. Providing the impact pathways referenced above for the Special Area of Conservation (SAC) sites are adequately addressed, NRW consider the notified features of the SSSI will also be adequately safeguarded.

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Landscape

The development is located within the Llŷn National Landscape (AONB). We note the submission of a Landscape and Visual Appraisal by Tirlun Barr Associates dated May 2024. We refer you to your internal Landscape Officer for advice on Landscape/Visual impacts. If you require further advice, then please reconsult us.

Protected Species

We note the information submitted in support of the above application (Biodiversity Enhancement Plan and Green Infrastructure Statement by Cambrian Ecology Ltd dated 7 May 2024). We welcome the proposed enhancements and recommend you discuss further measures/avoidance measures with your internal ecological advisor.

Fire Department:

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

The Fire Authority will have an opportunity to provide observations on the fire safety measures during the Building Regulations Consultation process.

Should you need further information, please contact the Compliance Officer.

Public Protection:

Thank you for consulting with the Public Protection Service regarding the above.

We have considered the planning application, and our observations are as follows:

Further information is required for the proposed treatment plant; the applicant is requested to provide the following information:

Evidence to show that the development cannot be linked to the mains sewerage system

Details of the number of properties and bedrooms proposed, together with a calculation of how much sewage the development will generate per day

Make, design specification, volume and details of discharge with respect to a soakaway for the private treatment plant

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A Management Plan that sets out how the system will be managed and maintained over the lifetime of the development

The workings and results of percolation tests in line with 'Approved document H, Drainage and

Waste Disposal, The Building Regulations 2010, H2.'

An accurate, annotated drawing and location plan for the soakaway/drainage field

Heneb:

The proposed development site is within the Lleyn and Bardsey Island (GW) 8 Registered Landscape of Outstanding Historic Interest, which has been divided into Historic Landscape Character Areas (HLCAs); the proposed site forms part of the 'Aberdaron Hinterland' character area, composed of an area primarily rural, with dispersed settlements, surviving traditional farm buildings and cottages, preservation of medieval field systems, as well as historic roads and tracks associated with the pilgrimage route to Bardsey. The key recommendation for this HLCA

is: Preservation of historic character of area, including retention and minimal alteration of field cloddiau and preservation of field patterns.

The proposed development is considered unlikely to impact the key historic landscape features of the area. As such, the proposed development for the siting of 10No of caravans would have a

neutral contribution to the key attributes of the Registered Historic Landscape and no impact on the HLCA, and the change of use would not have a bearing on the historic landscape significance.

Trees Unit:

This proposal is unlikely to impact existing trees. The proposed enhancement planting is suitable;

however, I would recommend that the following specifications are included:

Malus sylvestris should be sourced from the Abergwyngregyn population (prov. 303). There is no need to plant a standard tree in this location, as doing so increases the risk of pest and pathogen transmission, reduces the likelihood of successful establishment (particularly with the site specific conditions), and comes at a significantly higher

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cost to the developer. A one-year-old whip with a plastic-free rabbit tube would be more than suitable.

I would also recommend substituting standard *Salix caprea* with locally sourced *Populus tremula*. Again, there is no need for these to be standard trees, and they can instead be planted as whips with tubes and stakes.

The proposed copse mix is suitable; however, these should also be planted as young trees rather than standards. This approach would also remove the need for additional topsoil, fertiliser, and other soil additives (which can have a negative impact on biodiversity). I would further recommend that *Malus sylvestris* and *Populus tremula* are included within the mix.

AONB Department:

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. So far as we can see, this application is a resubmission of application C24/0413/30/LL (withdrawn) for 10 touring caravans at this site.

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 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 trees and hedges to screen the development. Such trees and hedges would take many years to establish and be effective. In

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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. 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 Uchaf to Bodermid Isaf 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.

Public Consultation:

A notice was posted on the site, and nearby residents were informed and the advertising period has expired. No other observations were received.

5. Assessment of the material planning considerations:

Principle of the development/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. 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 very 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 more visible from some points 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*

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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).

- 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 possible that with moderate visual sensory, the area is capable of accommodating minor change without significant damage to its distinctive features and that any impact would be small in the context of the wider landscape. The assessment states that planting new trees and hedges and improving existing hedges would strengthen the existing features and mitigate any visual impact. It is unlikely that the groundwork and planting work would be sufficient to screen the caravans completely for some years, if at all from some views.
- 5.5 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 development needs to *"where appropriate, for proposals that are within or affecting an installation and/or significant views into or out of the Areas of Outstanding Natural Beauty, take into account 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 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.
- 5.6 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.
- 5.7 The site lies within the Llŷn and Ynys 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 AT1 of the LDP.

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- 5.8 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."

- 5.9 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:

"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".

- 5.10 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

- 5.11 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

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the local neighbourhood, and the proposal is considered to be acceptable in terms of Policy PCYFF 2 of the LDP.

Transport and access matters

- 5.12 Concerns have been raised in relation to the main entrance to the proposed site. In particular, it is considered that there is potential for mud and loose material to be spilled onto the public highway, along with the possibility of damage to the roadsides as a result of the increase in traffic using the entrance. In order to mitigate these impacts and in the interests of highway safety, the comments of the Highways Unit require the applicant to upgrade the entrance to an appropriate and satisfactory standard and provide details of the proposed works, as well as restricting the second entrance to the use of pedestrians and emergency services vehicles only. This would help manage traffic movements in and out of the site, ensuring that all normal traffic uses the upgraded main entrance to an acceptable standard. As a result of the objection of the Highways Unit, the applicant was not asked for further information because of the objection to the principle of this development.
- 5.13 As a result of the above, the proposal is considered to be unacceptable and contrary to the requirements of policy TRA 4 of the LDP which confirms that proposals that would cause unacceptable harm to the safe and efficient operation of the highway will be rejected.

Biodiversity matters

- 5.14 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. Natural Resources Wales (NRW) in their response to the application note that insufficient information has been submitted as part of the application to adequately consider the potential impacts on the features of the protected sites, and in particular, to enable the Local Planning Authority to carry out a Habitats Regulations Assessment under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). The development proposes the installation of a private sewage treatment system (STCP), but the proposed discharge method is currently unclear. It is also noted that a spring is noted on one of the submitted plans. The drainage field should not be located in close proximity to this feature, and confirmation of appropriate separation distances is required. Should a discharge to watercourse be justified, the exact discharge location will be required and clearly indicated on a map. In addition, as the receiving watercourse is classified as minor/unknown, further information would be needed to demonstrate that it has sufficient capacity to accommodate a discharge of this nature and volume, should the scheme propose discharging to the watercourse. In addition, there is no information demonstrating how/where waste from the touring caravans is disposed of. Private sewage treatment stations (STCP) are not suitable to deal with chemical waste from caravans. A Chemical Disposal Unit (CDU) must drain into a sealed tank or cesspit, as the toxic nature of the effluent means that this cannot be discharged to ground or a watercourse.
- 5.15 This information was not requested because of the objection to the principle of the development, and therefore, because of these concerns, NRW objects to the request as submitted because of insufficient information provided to support the proposal.
- 5.16 This 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.

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- 5.17 In accordance with recent legislative changes to Planning Policy Wales (PPW) and the need to introduce 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

- 5.18 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.
- 5.19 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 required to give consideration to the Welsh language in Appendix 5 (The Screening Procedure) of the SPG (sections Ch to Dd). The guidance included within Appendix 5 notes that every retail, commercial or industrial development where there is no need to submit a Welsh Language Impact Statement/Assessment should 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.

Drainage and Flooding Matters

- 5.20 In accordance with the requirements of paragraph 7.6 of Technical Advice Note 15: Development, Flooding and Coastal Erosion, a Drainage Strategy must be submitted as part of an application to outline the drainage scheme for surface water from the site, unless a separate application has been made to the approval body, namely Cyngor Gwynedd's Land Drainage Unit. A drainage statement has not been submitted as part of the application, and the Land Drainage Unit has confirmed that they are opposing the application due to a lack of information. This information was not requested because of the objection to the principle of the development. Insufficient information has been submitted as part of the application to ensure that the proposal complies with the requirements of part 7 of TAN 15: Development, flooding and coastal erosion and therefore, it is considered to be contrary to this policy.
- 5.21 The site of the proposed development is partly located within Flood Zone 2/3 (Surface Water and Small Watercourses) as shown in the Flood Map for Planning. The Land Drainage Unit has confirmed, in accordance with the advice given within Section 6.1 of Technical Advice Note 15, that a Flood Risk Assessment is required to demonstrate that the proposed development is not at unacceptable risk of surface water flooding and that suitable measures have been included to increase the resilience of the development to flooding. In addition, the Land Drainage Unit's comments suggest that the applicant should consider the removal of the lowest two plots so that they are beyond the boundary of this flood zone.
- 5.22 No Flood Consequence Assessment was requested because of the objection to the principle of the development; however, it cannot be certain that the proposal would not be at an unacceptable risk of surface water flooding and therefore the application as submitted is contrary to the requirements of Section 6.1 of Technical Advice Note 15: Development, flooding and coastal erosion.

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- 5.23 In addition, paragraph 10.19 of TAN 15 confirms the following in relation to planning applications within Zone 2:

“Applications for highly vulnerable development on greenfield land will only be appropriate where the site has been allocated in adopted Development Plans. Proposals for the redevelopment of previously developed (brownfield) land at any vulnerability classification will need to support the Development Plan strategy to regenerate an existing settlement or deliver key economic or environmental objectives, and be consistent with that strategy. Where redevelopment proposals include residential uses, local authorities should ensure that such uses do not occur at ground floor level.”

Furthermore, paragraph 10.20 confirms the following in relation to planning applications within Zone 3:

“In Zone 3, sites should not be allocated for new highly vulnerable development because the flood risk and consequences of flooding are not considered acceptable for these types of development.”

The proposal constitutes new highly vulnerable development and is therefore contrary to the requirements of Policy TWR 5 of the LDP. In addition, the proposal includes residential accommodation at ground floor level and is consequently contrary to the requirements of both of the above provisions of TAN 15.

Other matters

- 5.24 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 plan. 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. Although a separate matter to the Planning system, it must be considered that without such resources, it is likely that obtaining a new licence would be problematic and that a further planning application would need to be submitted to amend the buildings and/or site.

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.

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- 6.3 Concerns have been raised in relation to the main entrance to the proposed site. In particular, it is considered that there is potential for mud and loose material to be spilled onto the public highway, along with the possibility of damage to the roadsides as a result of the increase in traffic using the entrance. In order to mitigate these impacts and in the interests of highway safety, the comments of the Highways Unit require the applicant to upgrade the entrance to an appropriate and satisfactory standard and provide details of the proposed works, as well as restricting the second entrance to the use of pedestrians and emergency services vehicles only. This would help manage traffic movements in and out of the site, ensuring that all normal traffic uses the upgraded main entrance to an acceptable standard. Therefore, it is considered that the proposal is unacceptable and contrary to the requirements of policy TRA 4 of the LDP which confirms that proposals that would cause unacceptable harm to the safe and efficient operation of the highway will be rejected.
- 6.4 No drainage statement has been submitted as part of the application, and therefore insufficient information has been submitted to be able to confirm that the proposal complies with the requirements of part 7 of TAN 15: Development, flooding and coastal erosion (2025) in terms of providing a sustainable drainage system.
- 6.5 The site of the proposed development is partly located within Flood Zone 2/3 (Surface Water and Small Watercourses) as shown in the Flood Map for Planning. No Flood Consequence Assessment has been submitted as part of the application and, therefore, it cannot be certain that the proposal would not be at an unacceptable risk of surface water flooding and therefore the application as submitted is contrary to the requirements of Section 6.1 of Technical Advice Note 15: Development, flooding and coastal erosion.
- 6.6 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 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.

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3. Insufficient evidence has been submitted as part of the planning application to demonstrate that full consideration has been given 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 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. The proposal as submitted entails the use of a sub-standard entrance and the use of a second entrance without restriction. It is considered that the proposal is unacceptable and contrary to the requirements of policy TRA 4 of the Anglesey and Gwynedd Joint Local Development Plan which confirms that proposals that would cause unacceptable harm to the safe and efficient operation of the highway will be rejected.
5. No drainage statement has been submitted as part of the application, and therefore insufficient information has been submitted to be able to confirm that the proposal complies with the requirements of part 7 of TAN 15: Development, flooding and coastal erosion (2025) in terms of providing a sustainable drainage system. Development, flooding and coastal erosion (2025) in terms of providing a sustainable drainage system.
6. The site is located partly within Flood Zone 2 and Flood Zone 3 for surface water and small watercourses, as identified on the Flood Map for Planning. No Flood Consequence Assessment has been submitted in support of the application, and the proposal involves the provision of new highly vulnerable development at ground floor level. Consequently, the proposal does not comply with the requirements of paragraphs 6.1, 10.19 and 10.20 of Technical Advice Note 15: Development, Flooding and Coastal Erosion (2025), which seek to ensure that highly vulnerable development is not located within flood zones where it would pose an unacceptable risk to life.