PLANNING COMMITTEE	DATE: 13/12/2021
REPORT OF THE ASSISTANT HEAD OF ENVIRONMENT DEPARTMENT	

Number: 1

Application Number:	**C21/0106/40/LL**
Date Registered:	**04/06/2021**
Application Type:	**Full**
Community:	**Llannor**
Ward:	**Abererch**
Proposal:	**Change of use of land for the siting of 10 holiday pods along with changes to the current access, creation of passing places, creation of internal access road and landscaping.**
Location:	**Fferm Llwyndyrys, Llwyndyrys, Pwllheli, Gwynedd, LL53 6RH**
Summary of the Recommendation:	**TO REFUSE**

1. Description:

1.1 Members are reminded that this application was deferred at the Planning Committee dated 4 October after receiving additional information from the agent and holding a further assessment of the information before reporting back to the committee. This is a full application that intends to change the use of a section of the existing agricultural land for the siting of 10 new permanent pods or holiday cabins and the creation of a new access road, creation of parking spaces and associated footpaths, creation of passing places for vehicles on the nearby public road, creation of a new footpath, new landscaping and drainage systems.

1.2 The site is located on extensive agricultural land situated to the east of the applicant's property and curtilage which is an open area in the countryside. The main property, namely Ffermdy Llwyndyrys is a grade II* listed building and within the nearby curtilage, a number of outbuildings have been converted into self-contained holiday units. In addition, various outbuildings and sheds associated with the agricultural use can be seen. The site is located within a Landscape Conservation Area and the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest.

1.3 For information, the holiday unit letting business has been established and is maintained to a high standard and five separate cottages are provided, which can offer accommodation for between 2 and 8 people. In addition, it can be seen that spa services are being offered on the site.

1.4 The main element of the application would be on a site located within two field lengths from the main farm site, with a new access road created and leading off the existing access road to the farm, crossing an existing open agricultural field (Field A). Two parking spaces for six vehicles each would be created in the eastern part of the first field, and then access would be gained on foot from the parking spaces along the new footpaths, leading to five new openings through the existing stone wall/hedge that would lead into the second field (Field B), and towards the holiday units. There is an existing entrance within the wall, and it is intended to create a new 2m wide footpath near the entrance and onwards through Field B and then there are other open agricultural lands towards the A499 and an existing bus stop located in the south-east. Field A is relatively flat, whilst the location of the units on Field B are also relatively flat; however, it can be seen that the rest of the land falls to lower levels towards the north and substantially so to the east, south-east and the south, giving an elevated and prominent appearance to the site from nearby areas.

1.5 An existing class 3 road leads to the farm from an existing junction on the busy A499 road, with a wide vehicular access already created to serve the farmhouse and the holiday units. There are general features within the area, including field formations with stone *cloddiau* and established hedges, also a growth of mature trees can be seen dispersed within the farm site and in the area in general. An ancient woodland, which includes a number of mature trees, abuts Field B to the north.

1.6 The cabins would be positioned in an informal line close to the existing boundary of Field B. Footpaths would lead to the 10 individual units and landscaping would be carried out in order to create an appearance of 10 sites that are separate and concealed from each other. The cabins would be connected to the sewerage treatment system and electricity connections.

1.7 There would be two types of cabins, measuring around 7m by 3m and approx. 4m to the ridge (two would be slightly larger than the other 8). They would be constructed from timber, with the most prominent gable end of the units containing a floor-to-ceiling glazed opening. A decking or outdoor terrace would be connected to all units; some to the front and others on the side. Internally, they would provide a space for living, eating, sleeping and bathing, with 8 units for two people and 2 units for the use of up to four people.

1.8 As already noted, it is proposed to landscape the site with native trees and hedges, whilst improvements are to be made where needed to the existing hedge on the boundary between Field A and Field B. The new access road and footpaths would be finished in local crushed and compacted stone, whilst the parking spaces would include reinforced grass.

1.9 The following documents have been submitted to accompany the application:

- Planning statement
- Landscape statement
- Transport Statement
- Drainage statement
- Ecological assessment
- Trees assessment

1.10 The application has been amended since it was originally submitted by relocating the new access road from the original location proposed off the public road to a location off the existing access road leading towards the farmhouse. In addition, the location of the footpath leading from the site to the junction with the A499 was changed so that it would start from the centre of the site and run across higher open lands rather than what was originally intended, due to concern about the wet condition of the land. Also amended was the location of the northern boundary of the site where Unit 10 would be located, in order to create a zone to protect the nearby ancient woodland. As a result of these amendments, the relevant statements and assessment were also amended.

1.11 The application is submitted to the Committee as the size of the proposed development is greater than what can be considered under the delegated procedure. For information, the proposal has been assessed in terms of its compliance with the requirements of the Environmental Impact Assessment, and in this case it is not believed that the proposal is a development that would be the subject of a formal environmental assessment based on relevant requirements.

1.12 In the additional information received from the agent in response to the concerns noted in the original report and following a discussion held on the site with the applicant, it is noted:

- Sustainability matters - it is a uitable location close to public transport links; the use of the existing holiday cottages has established a visiting pattern including visitors arriving by train with an arrangement for the applicant to fetch them; recent appeal decisions about similar development on Angelsey approved despite the authority's concerns and objections about its unsustainable location

- Impact on visual amenities - it was originally intended to place the units closer to the farm buildings but due to lack of shelter and concern about the proximity to a listed building, this was not considered further; there is an established hedge on the application site which would create a suitable backdrop with time, the units' finishes would change with the weather and would therefore blend into the site; the form of the units is 'traditional' and is in keeping with the rural location; the access road would convey the appearance of an usual agricultural road and would not be visible due to the established boundaries; there is no specific appearance noted in the report as a concern, 10 locations have been assessed within the landscape statement but these are not referred to or disagreed with in the report

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 (Wales) Act 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**

PS 1: The Welsh Language and Culture

PCYFF 1: Development Boundaries

PCYFF 2: Development criteria

PCYFF 3: Design and place shaping

PCYFF 4: Design and landscaping

PS 5: Sustainable development

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

PS 4: Sustainable transport, development and accessibility

TRA 2: Parking standards

TRA 4: Managing transport impacts

PS 14: The Visitor Economy

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

PS 19: Conserving and enhancing the natural environment where appropriate

AMG 5: Local biodiversity conservation

PS 20: Preserving and where appropriate enhancing heritage assets

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

Also relevant in this case is the Council's adopted Supplementary Planning Guidance:

SPG Tourist Facilities and Accommodation (2021)

SPG Maintaining and Creating Distinctive and Sustainable Communities (2019)

2.4 **National Policies:**

Future Wales: The National Plan 2040

Planning Policy Wales, Edition 11, February 2021

Technical Advice Note 12: Design

Technical Advice Note 13 – Tourism

Technical Advice Note – 18 Transport

Technical Advice Note 5: Planning and Nature Conservation

Technical Advice Note 20: Planning and the Welsh Language

Technical Advice Note 24: The historic environment

3. Relevant Planning History:

3.1 It does not appear that there is any planning history in the form of formal applications that relate specifically to the lands where the application site is located.

3.2 Y20/0418 – Creation of static caravan site – it is noted that this was an enquiry regarding a site for up to 15 static caravans/chalets and that it was in a more central location than the subject of the current application. In response to this enquiry, concerns were noted about the impact of the proposal in terms of the visual impact, the impact on the local roads network and the location of the site in an unsustainable location was also considered. Consequently, it was confirmed that it would be very unlikely that the proposal would be supported. It is also noted, despite the similarities of some aspects of this proposal and the existing application, there are distinct differences between both proposals also.

4. Consultations:

Community/Town Council:	Support. Second consultation – support.
Transportation Unit:	Express concern about the location of aspects of the application. There is no objection to the proposed location of the proposal and it is believed, with the suggested improvements, namely additional passing places, that the road can cope with the additional vehicular traffic. The main concern is the location of the proposed entrance. It is proposed to provide a two-way vehicular access instead of the existing small agricultural entrance, but in order to satisfy the visibility needs, there would be a need to demolish a substantial length of the wall/hedge to the east. In addition, the proposed entrance is within 100m of the entrance to Fferm Llwyndyrys, which already offers holiday accommodation, etc., and it could be confusing for visitors. To remove the need for a new entrance and the

	demolition of boundaries, and to provide a single entrance for all attractions, it would make more sense to use the current entrance of the farm, with an access track leading to the site in question. There is no objection to the proposal of providing a footpath through the fields and to the bus stop on the A499; however, it is noted that sections of the field (mainly the entrance adjacent to the solar farm), holds water and is impossible to navigate across following periods of rainfall. Second consultation – It is confirmed that the transportation unit does not object to the proposal. It is noted that the application is now amended, removing the proposal for an independent entrance, and making use of the existing entrance leading to the farm and the existing holiday units. It is assumed that this arrangement is more convenient and that it will be easier to direct visitors to the site. It is confirmed that there is no objection to the proposal in terms of the increase in transportation. Although it is likely that the proposal will lead to an increase along the rural road leading from the A499 towards Fferm Llwyndyrys, it is assumed that the current traffic levels are low and that the increase is unlikely to reach unacceptable levels. The application identifies a number of passing places along the route to the site to facilitate the easy passage of traffic. It is noted that recent work has been done to improve the standard of the passing places associated with the solar farm scheme adjacent to this application site. The application also includes a proposal to provide a footpath through the applicant's fields in order to provide a pedestrian link between the application site and the bus stop on the A499. I can confirm that the Transportation Unit has no objection to this element, as it would reduce dependency on the county road as a means of reaching the bus stop.
Natural Resources Wales:	We have significant concerns regarding the proposed development as submitted. An amended ecological assessment which responds to concerns by means of appropriate mitigation measures is required. Second consultation – We remain concerned about the application as submitted, nevertheless, we are satisfied that these concerns can be overcome if the report of Cambrian Ecology, dated 01.01.21 is included with a formal condition.
Welsh Water:	Standard advice Second consultation – standard advice
Public Protection Unit:	Standard advice regarding the water supply

	Second consultation – not received
Conservation Officer:	Not received
Fire Service:	No observations Second consultation – No observations
Pollution Control and Licensing Service:	Comments regarding defining the types of units proposed, potential access/health and safety issues between agricultural use and holiday use Second consultation – Concerns about the lack of information to confirm the form and type of units for the purposes of defining the type of licence required.
Biodiversity Unit:	No objection provided that the recommendations of the ecological survey are followed. Second consultation – Need a biodiversity improvement plan that includes improving the hedges on the site by planting native species. Need to avoid the nesting season (March-August) when clearing the hedges. It is suggested that the landscaping scheme includes planting native species, such as wild-flower meadows to improve the biodiversity on the site.
Rights of Way Unit:	Not received
Trees Unit:	The woodland that runs along the boundary of the development site is registered as an Ancient Woodland, so it has very high Biodiversity value. Although the plans suggest that the development will not reach the boundary of the woodland, a more detailed plan is needed to show that there is no development within the root protection area. The site has also been designated as a wildlife site. Second consultation – The tree report shows that the trees on the site are in a good condition and it notes that only one tree will be affected by the development. This impact will be located within the rooting area by a path and the location of unit 3 on the plans. The report proposes measures to mitigate this impact and there is a need to impose a condition that the work methods and these materials are

used for the development. The report and the information contained in it correspond with good practice and BS5837/2012 guidance.

CADW: Not received

Public Consultation: Notices were posted on the site and nearby residents were notified. The original advertisement period and second consultation have expired and letters / correspondence were received objecting on the following grounds:

- Overdevelopment
- No need for a second vehicular access/narrow road with only one passing place
- Harmful impact on the site of a restored ancient woodland
- Lack of information and misleading information
- Lack of benefits for the Welsh language
- Sustainability matters
- Harmful effect on listed buildings
- Concerns about biodiversity/tree matters
- Lack of screening elements of the proposal

As a result of the second consultation, further observations were received, noting:

- Substantial improvements on what was originally proposed, but remain concerned about the lack of information and the need to ensure suitable landscaping/screening, particularly in relation to the new access road.

5. Assessment of the material planning considerations:

The principle of the development

5.1 The proposal as submitted involves creating a site to include new and permanent holiday units as well as all associated elements, such as creating a new access road, link paths and landscaping.

5.2 Policy TWR3 states that static caravan and chalet sites or permanent alternative holiday accommodation outside the Llŷn Area of Outstanding Natural Beauty (AONB) and Special Landscape Areas (SLA) will be approved, provided that all the following criteria can be met:

i. Where it can be proved that it does not lead to an excess of static caravan or chalet sites or permanent alternative holiday accommodation sites in the local area; and

ii. That the proposed development is of a high quality in terms of design, layout and appearance, and is sited in an unobtrusive location which is well screened by existing landscape features and/or where the units can be readily assimilated into the landscape in a way that does not significantly harm the visual quality of the landscape; and

iii. That the site is close to the main roads network and that adequate access can be provided without significantly harming landscape characteristics and features.

These units are not located within an area where an excess of sites similar to what is proposed are seen and therefore it is not believed that the proposal is unacceptable on the grounds of the first criterion. The land is elevated and as a result, it is in a prominent location, despite the existing trees located nearby and the proposal to maintain landscaping on the site. It is not believed that this is an unobtrusive location and to this end, the proposal fails on the second criterion (ii) and is therefore contrary to the requirements of this policy. Also, there are concerns about sustainability matters and despite the information and the proposal submitted which includes a designated footpath from the site to the bus stop on the nearby highway, it is not believed that the proposal succeeds in this case, and therefore fails on the requirements of criterion iii. This element is discussed in detail in the rest of the report.

5.3 To elaborate on the above, criterion i refers specifically to an intensification of new developments. In order to define 'intensification' in this context, one should refer to the paragraph of explanation in 6.3.69 in policy TWR 3 (along with Appendix 3 – Sensitivity and Capacity Maps (paragraph 5.3.3), SPG Tourist Facilities and Accommodation) that refers to the 'Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014). Within each Landscape Character Area (as described by the Gwynedd Landscape Strategy (2012)) the landscape's capacity is assessed to ascertain the capacity of the local landscape for further developments of holiday chalets or caravans.

5.4 This particular development falls within the G10 Landscape Character Area (Mid Llŷn). The Landscape Sensitivity and Capacity Study notes the indicative capacity for the Landscape Character Area. Specifically, in relation to the LCA relevant to this application, it is noted, "Outside the AONBs and SLAs there may be very limited capacity for developments typically comprising of small scale to very small scale, sensitively sited and well-planned developments that should relate well to the existing built environment / urban ground cover". The Study defines very small developments as those up to 10 units and small developments as those between 10 - 25 units. Therefore, appropriate consideration will need to be given to the scale of the proposed development in the location in question. In accordance with the Landscape Sensitivity and Capacity Study the number of units (10) proposed for this site are defined as a small development.

5.5 Criterion ii. refers to the design, layout and appearance of the proposed development. The policy states that new developments should be located in an unobtrusive location. Within the Plan, an unobtrusive location is described as being one which is well screened by existing landscape features or where the units can be readily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape.

5.6 The site is located within an area that is typically open with expansive views towards Mynydd Carnguwch, Yr Eifl, the mountains of Snowdonia and the Coast. It is noted that the northern side of the main site (including the holiday units) abut an ancient woodland, which includes a number of native trees. It is acknowledged that there is an intention to landscape the site with suitable native trees and plants. The site is divided by containing the units within one field (Field B) and the access road and parking spaces (Field A), with a stone wall/existing traditional hedge (which is a feature of the nearby area), and it appears from the plans that it is intended to retain the majority of the *clawdd* where needed, although it is noted that there is an intention to create five new openings for pedestrians. Despite the proposal to maintain suitable landscaping in terms of the use of native plants, it is considered that this need to conceal the proposed units involves providing landscaping that is out of character with the rest of the area and the current open nature of the fields. Therefore, to this end, it is considered that the proposal fails to meet this criterion. It must also be noted that

the land elevates a considerable amount when you look at the site from the south, the south-east and the east in particular. The design of the units themselves suggest that including a gable end with glass from floor-to-ceiling is intentional, in order to make the best of the outward looking views. Therefore, if having an unspoilt view for the units is behind the design, it stands to reason that the units are therefore visible and prominent when you look towards the site.

5.7 Criterion 1 iii) refers to highway matters. The Transportation Unit does not object to the proposal on grounds of road safety and the increase in the use of the local roads network. To this end, it is not considered that the proposal is contrary to the requirements of this criterion, in terms of this particular element. Nevertheless, consideration is given to the location of the units in terms of sustainability matters and the suitability of the site in terms of its location to these considerations. An element of the proposal includes providing a bespoke footpath from the site through the owner's current open fields, towards the nearby A499 highway junction, where two bus stops can be seen on either side of the road (one to the direction of Pwllheli and one to the direction of Caernarfon). On paper, the distance of the site from these two bus stops is relatively short (around 800m) and the current service is regular in terms of the number of buses that would pass by daily. This effort to secure pedestrian access is to be praised; however, consideration must be given to the practicality of the proposal and the nature of people who wish to have convenience whilst on holiday. It is quite likely that some would use the path, but realistically, how practical would it be to use it every time when they need to visit the broader area, go out for a meal, go grocery shopping, etc. The weather is one factor of course (particularly during a season of poor weather as it is proposed to use the units all year), but for families, particularly families with children, it is not believed that it would be a completely practical option to use on all occasions. The choice therefore would be to use private vehicles to come and go from the site which, unfortunately, is unsustainable. Consequently, the proposal is not considered to be completely in accordance with the requirements of criterion 1iii as it is not considered close to the main roads network.

Visual amenities

5.8 As noted above, the site is not within an area that is recognised for its special landscape, but due to the elevated nature of the site and the open nature of the area around it, particularly to the south, south-east and the east, it is considered that providing the units and the landscaping required to mitigate their impact would have a detrimental impact on the local landscape.

5.9 The site is located away from the Fferm Llwyndyrys property and site. The development would involve using existing open green lands, with a distinct divide between the new sites and the farm site. For example, the access road navigates through the centre of Field A, whilst the units would be installed within Field B, which is obviously a completely separate field which spreads the development out even further away from Fferm Llwyndyrys and its extensive curtilage. It is quite likely that the location of the units is intentional in order to capitalise on the views, as the quality of the views would not be as good if located closer to the existing farmhouse. Nevertheless, and as noted within the 'Anglesey, Gwynedd and Snowdonia National Park Landscape Sensitivity and Capacity Study' (Gillespies, 2014), it is expected for the relationship of small-scale developments to be in keeping with the existing built environment and that small developments should be located close to existing buildings in order to avoid the frequency of developments within the broader landscape and the erosion of rural features. It is not just concern about the 10 units, but also about the accumulation of all elements, including the access road across an open agricultural field, and the proposed parking area. It is believed that adding the parking area would, for example, introduce an alien feature within a location where a relatively defined pattern can be seen in the current form and appearance of open agricultural fields that are defined with earthen *cloddiau* and hedges or dry-

stone walls. Consequently, it is believed that the site is in an intrusive location and that it would therefore harm the visual amenities of the nearby area.

5.10 Therefore, it is considered that the proposal is contrary to the requirements of policies PCYFF 2, 3 and 4 of the LDP.

5.11 The site is located within a Landscape Conservation Area and the Llŷn and Bardsey Island Landscape of Outstanding Historic Interest. This vast area extends over an extensive part of the area, and refers to the area's features and character. It is not believed that this proposal would harm the setting and significant views within the historic landscape or on the listed building of Fferm Llwyndyrys itself and so it is not believed that the proposal is contrary to the requirements of policies PS 20 and AT 1.

Residential amenities

5.12 The site is in a rural location, some distance away from any nearby residential house. It appears that the nearest residential site (apart from Fferm Llwyndyrys itself), is around 600m away to the north-west and beyond the ancient woodland, then followed by agricultural fields. Therefore, it is not believed that the proposal would cause any obvious harmful impact on residential amenities as a result, and is therefore acceptable in terms of the relevant requirements of policy PCYFF 2 in terms of the impact on local property occupiers.

Transport and access matters

5.13 Policies TRA 2 and TRA 4 of the LDP involve assessing proposals in terms of their impact on road safety and parking provision. In this case, it is proposed to develop a new holiday site, served by a narrow and restricted public road. The application has been amended since it was submitted originally, by removing the proposal to create a completely new vehicular access for the site off the public road, but rather use the existing wide access serving Fferm Llwyndyrys (which also includes the established holiday cottages). It is accepted that this is an improvement as it disposes of this element of the proposal. Changes are made to the existing agricultural access off the road towards the farm to the nearby fields, as well as the provision of an access road, footpaths and the provision of parking and turning spaces for 12 vehicles.

5.14 Although initial concerns were highlighted about aspects of the plan by the Transportation Unit, they have not objected to the proposal on the grounds of road safety and the increase in traffic on the local roads network. Since amending the contentious elements, the unit now accepts that the proposal is improved. It can be seen that this public road currently serves Fferm Llwyndyrys and the previously developed holiday cottages, but it is also an important link to the nearby village of Llwyndyrys and a number of farms dispersed in the area. It must also be noted that a solar farm development is also located near this site and uses the same road as access towards the site. Nevertheless, considering that the majority of the work to create the solar farm is completed, it is relatively likely that the levels of transport visiting the site will be low.

5.15 It is quite likely that visitors would be unfamiliar with the local roads network and would possibly be unused to using such a network that is narrow with dispersed passing places. The road is also used of course by agricultural machinery for nearby farms, and occasionally, by traffic movements associated with the nearby solar farm. Nevertheless, the Transportation Unit has considered the current situation when assessing this application and they do not object to the proposal on the grounds of access and road safety matters.

5.16 Therefore, it is considered that the proposal complies with the relevant requirements of policies TRA 2 and TRA 4 and these particular elements.

Biodiversity/Tree Matters

5.17 Initial concern was highlighted about the proposal in terms of its potential impact on local biodiversity and trees, and particularly the ancient woodland located to the north of the site. As a result of the concerns about the impact on the woodland, the proposal was amended by moving the location of Unit 10 and creating a zone to protect the woodland trees located nearest to the site. It would be customary to impose a condition to ensure that these measures are followed and thus protect this ancient woodland, as recommended by the Trees Officer.

5.19 An amended ecological assessment was also received in response to concerns raised by NRW mainly about the impact of the development on local wildlife and Biodiversity. Since receiving this information, NRW have confirmed that although they remain concerned, they will not object provided that a formal condition is imposed to ensure that the recommendations of the amended assessment are followed. It is believed that this is reasonable and that it would be practical, if approval is recommended, for this to be included, and thus ensuring compliance with policies AMG 5 and PS 19.

Sustainability matters

5.19 To elaborate on sustainability matters as referred to in paragraph 5.10 above, consideration will be given to the requirements of Policy PS 5 Sustainable Development, which supports developments that are consistent with sustainable development principles, and where appropriate, developments should:

"Reduce the need to travel by private transport and encourage opportunities for all users to travel when required as often as possible by means of alternative modes, placing particular emphasis on walking, cycling and using public transport, in accordance with Strategic Policy 4" (Bullet point 12, Policy PS 5)."

This is supported by bullet point 4 of policy PS 14 (The Visitor Economy), which notes:

"Supporting appropriately scaled new tourist provisions and enterprises in sustainable locations in the countryside by reusing existing buildings, if appropriate, or as part of diversification on farms, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives;"

5.20 It is considered that the policies of the LDP are consistent with local and national planning policies in terms of how it deals with sustainable development principles. Paragraph 3.35 PPW states:

"In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes when compared with the rural area as a whole. Development in these areas should embrace the national sustainable place-making outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys."

5.21 The site is located in a rural location, a considerable distance from any nearby serviced village or town. The proposal to include a footpath in order to link with the bus stop near the junction with

the A499 is praiseworthy; but despite this and the fact that there is only a relatively short distance between the site and the bus stop, practically, it is not believed that regular use would be made of public transport in terms of practicality and on occasions of bad weather. Due to the rural location of the proposal, visitors would most likely use their own transport to travel to the site and attractions / shopping / services during their stay.

5.22 As confirmed in paragraph 4.3.2 of the Transport Statement, the majority of the site's users would be likely to use their own vehicles to reach/leave the site as part of their daily activities; therefore minimal pedestrian movements would be likely. Although the rural site is attractive in terms of its relatively secluded location for those in search of a more relaxed and tranquil holiday, it is quite likely that using private vehicles would be the most obvious use when coming and going to/from the site. This is noted further in the report within paragraph 6.1.5, which states: *"The very nature of the development being isolated from other uses will not naturally facilitate travel by sustainable modes. In the proposed development's case, this is part of the very attraction of Holiday accommodation".*

5.23 It is accepted that some visitors would bring some food and drink supplies with them and it is accepted that the site would provide a welcome food pack for visitors, and possibly breakfast packs. Nevertheless, this would be restricted and users would not necessarily wish to cook whilst on holiday, and so, unavoidably, they would need vehicles to visit restaurants/pubs/shops as there are none located within a reasonable walking or cycling distance.

5.24 Therefore, despite the praiseworthy effort to develop measures to encourage pedestrians and cyclists to use the link path to the A499 and the forward transport links to villages and towns located further afield, it is not believed that the proposal succeeds to be a completely sustainable site in this case and consequently it is contrary to the relevant requirements of TWR 3, PS 5 and PS 14.

Language Matters

5.25 In accordance with the relevant requirements of policy PS 1 and the SPG, it is not required to prepare a linguistic statement in this case. However, there is an expectation for the Welsh language to be considered. Within the Planning Statement submitted with the application, it can be seen that consideration is given through a series of specific measures. It is noted that all of the existing holiday cottages have Welsh names in order to convey their history and connection to Fferm Llwyndyrys. It is confirmed that Welsh names would also be used on the new units. It is also noted that only holiday use would be made of the units and so, the visitors would only have a short presence there and this would not change the number or population pattern of the area. The applicant and the family are Welsh speakers and the existing website of the holiday cottage letting business is bilingual and the intention is to continue in this manner with the proposed development. Therefore, it can be seen that relevant consideration has been given to the Welsh language in this case, in accordance with the requirements as noted above. As a result, it is believed that the proposal is acceptable in terms of the requirements of policy PS 1.

Response to the public consultation

5.26 Observations were received during both public consultation periods, attention was given to the relevant Planning matters noted and full consideration was given to the observations as part of the above assessment.

Response to the additional information received

5.27 Following deferral of the discussion on this application at the planning committee in October, further information was received in the form of a statement from the agent. This latest information is a response to a conversation that was had on the site with the applicant and following publication of the committee report.

5.28 During the discussion on the site, the applicant elaborated on the background of various aspects in terms of his hopes for the future and his vision about the business and what can be provided locally. The information submitted by the agent elaborates more about this and partly responds to the main points raised in the report. Nevertheless, this is a matter of opinion with arguments against the content of the report to committee and it is not seen that there are any adaptations or amendments to any elements of the development compared to that submitted. It must be accepted that there is disagreement with officers' opinion but having considered the matters raised in full, it is not believed that what is noted is grounds for changing the officers' opinion in this case. As has already been noted above, no amendments if proposed to any elements of the plan and, therefore, the proposal remains in terms of its form to what was considered when preparing the report originally.

5.29 The form of the existing land, not only within the site but generally within the local area, is established with the presence of traditional boundary treatment creating a rural pattern typical of the area. Despite the argument that the units and associated developments will be comparatively small, they would still introduce new elements on land which does not include these views currently and, therefore, unavoidably there will be a visual impact. The proposal would spread from the existing site to rural countryside which currently conveys unspoiled views, therefore, concern remains regarding this element. Therefore, it is considered that the proposal remains contrary to the relevant requirements of policies PCYFF 2, 3 and 4 of the LDP.

5.30 In terms of the sustainability matters, it must be accepted that there is a difference of opinion here and clearly recent appeal decisions on Anglesey have given an opinion to some extend on this element as well. It must be recognised that the propose footpath is an appropriate footpath link to the main road where there are existing bus stops. Nor is it believed that the distance is genuiney challenging. However, as noted above, officers' opinion has already been given and despite the consideration given to all the information submitted, the concern regarding this element as highlighted in the committee report remains and therefore it is considered that the proposal remains contrary to the relevant requirements of policies TWR 3, PS 5 and PS 14 of the LDP.

5.31 Full attention was given to all the information received and though there is better understanding of the background of some aspects of the proposal, this in itself has not convinced officers to change their opinion.

6. Conclusions:

6.1 Based on the above assessment, and despite the additional information, the amendments made to the proposal and the acceptable elements, it is considered that the proposal is unsuitable as it would cause a detrimental and substantial impact on the landscape and local visual amenities, as well as concerns in terms of sustainability considerations.

7. Recommendation:

7.1 To refuse – reasons

1. The proposal involves the creation of new holiday units in open countryside and way outside any development boundary. It is believed that it is an unsustainable site that is not close to the main roads network where the majority of visitors would rely upon using their private vehicles. It is therefore considered that the proposal is contrary to the requirements of criterion 1iii, TWR 3, as well as the relevant requirements of policies PS 5 and PS 14 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017).

2. The proposal, due to its open location, would be intrusive and would have a substantially significant and harmful impact on the visual amenities of the local area and it is not considered that the proposal would conserve and enhance the natural beauty of the landscape. It is therefore considered that the proposal is contrary to policies PCYFF 2, 3 and 4, along with criterion 1ii of Policy TWR 3 of the Gwynedd and Anglesey Joint Local Development Plan (July 2017).