

PLANNING COMMITTEE	DATE: 14/07/2025
REPORT OF THE ASSISTANT HEAD OF DEPARTMENT	

Number: 6

Application Number: C25/0008/39/LL

Date Registered: 09/01/25

Application Type: Full

Community: Llanengan

Ward: Abersoch with Llanengan

Proposal: Increase number of caravans to a total of 15 touring units, construction of toilet/shower block, landscaping and associated work.

Location: Berth Ddu Caravan Park, Bwlchtocyn, Pwllheli, Gwynedd, LL53 7BY

Summary of the Recommendation: TO REFUSE

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1. Description:

- 1.1 This full application relates to extending the existing caravan site into an adjacent agricultural field, as well as the construction of a new toilet and shower block, landscaping and associated works. The proposal is to increase the existing site from 7 plots to a total of 15 touring caravan plots and undertake soft landscaping improvements by reinforcing and filling gaps in the cloddiau.
- 1.2 The site is located outside any development boundary as shown in the Gwynedd and Anglesey Joint Local Development Plan (LDP) Inset Maps; therefore, the site is considered as open countryside. The Berth Ddu property itself stands to the south of the application site and there are dispersed residential houses within the local area. The site is also within the Llŷn Area of Outstanding Natural Beauty and within the Llŷn and Enlli Landscape of Outstanding Historic Interest. The site is served by a single lane, rural unclassified road. The land in question is graded as class 2 land, i.e. good quality agricultural land.
- 1.3 Having investigated the site's planning history, it does not appear that any Planning permission exists for the caravans. During the site inspection we found that a 'Caravan and Motorhome Club' certified location sign was on display there, however, having made enquiries with the exempt Club, confirmation was received on 23/01/25 that the site is no longer a member of the Club due to a change in ownership. Therefore, in reality, this is not an application to extend an existing site; instead, it is an application for a new touring caravan site (15 caravans). Subsequent contact was then made with the Caravan and Motorhome Club to check whether there had been any changes to the situation and confirmation was received on 09/06/25 that there had been no changes since January and that the site no longer had an exemption certificate.
- 1.4 The application is submitted to the Committee as this is an application for developments on a site which is 0.5 hectares or more in size

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 (Wales) Act 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet the 7 well-being goals within the Act. This report has been prepared in consideration of the Council's duty and the 'sustainable development principle', as set out in the 2015 Act. In reaching the recommendation, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.
- 2.3 **Anglesey and Gwynedd Joint Local Development Plan 2011-26, adopted 31 July 2017**

PS 1: The Welsh Language and Culture

TRA 2: Parking standards

TRA 4: Managing transport impacts

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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.

Supplementary Planning Guidance (SPG): Tourist Facilities and Accommodation

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

2.4 **National Policies:**

Future Wales: The National Plan 2040

Planning Policy Wales (Edition 12 - February 2024)

Technical Advice Note (TAN) 13: Tourism

Technical Advice Note (TAN) 18: Transportation

3. **Relevant Planning History:**

3.1 No recent relevant planning history.

4. **Consultations:**

Community/Town Council: Not received.

Re-consultation:

Thank you for the below, but it is interesting to read that observations are needed within 14 days after amended plans are received, particularly as the 'first' application was not received - when was that

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one sent...?

Transportation Unit:

I refer to the above application and I confirm that the transportation unit does not have any objection.

Public Protection Unit:

Observations 22.1.25

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

1. Health and Safety at Work etc Act 1974
2. The Caravan Sites and Control of Development Act 1960
3. Model Standards 1983 -Touring Caravans / Tents. The development must comply fully with the licence conditions www.gwynedd.llyw.cymru/caravanlicence
4. Application to amend 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 licence 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'.
5. Boundaries – Hedges. The location of the caravan demonstrates that its location will be too close to a boundary / hedge. This proposed location of the caravan does not meet licence conditions as it creates a risk of fire spreading. Licence conditions recommend that caravans are located 3 meters away from any boundary / hedge.
6. 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 licence conditions (Model Standards 1983).

Re-consultation Response 10/02/25

Following the amended Site Plan dated 03-02-2025 this Licensing Service has no further observations.

Application to amend the Site Licence following planning approval. 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 licence 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, Cyngor Gwynedd on 01766 771000 or

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licensing@gwynedd.llyw.cymru

AONB Unit:

Berth Ddu caravan site is located in the Sarn Bach area and in the Area of Outstanding Natural Beauty (AONB). The land is visible from some nearby public vistas but it is not very prominent in the landscape. It is noted that an amended site plan has been received.

Currently the site operates via a caravan club licence for 5 units. The application is for the creation of a site for 15 units and a toilet / shower block on two agricultural fields. We note the proposal to plant more trees and create a new hedge on the eastern boundary which would, in time, contribute towards biodiversity and screen the site.

Viewpoints are provided on touring caravans in the AONB in policy TP9 of the Management Plan, which notes: 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.

On the whole, there is now a substantial number of touring caravans in the community of Sarn Bach / Bwlchtocyn, 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.

Biodiversity Unit:

Comments 27/02/25

The proposed plans show the planting of a new hedge, but the aerial imagery shows that a hedge already exists. I recommend fields Managed as traditional hay meadows, which appear to be the case in the aerial image I recommend that Yellow rattle seed is sown together with wildflower mix in on ground that is disturb due to installation of the toilet block and septic tank.

Response to the re-consultation 04/06/25

Photographs from the site show that a length and clawdd has been removed at the entrance and a bund of earth is now in its place. In the original plan it shows the earth bund with proposed tree & shrub planting on it, in the amended plan (received 6th May 2025) the tree planting has been omitted. I recommend that this bund is planted with trees.

Also photographs from the site show that a new gravel track at the entrance is already there.

I can see from the aerial photographs that the fields are managed as a wild flower meadow and I am pleased by this and to ensure that

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this continues I would like a plan showing these fields to be managed as wild flower meadow (see map below on which I have circled the wild flower meadow fields). These fields must not be ploughed or sprayed with weedkiller. The fields should be cut for hay at the end of the summer.

I have no objection once the changes I have recommended have been made.

Natural Resources Wales:

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 04/06/2025.

We have no objection to the proposed development as submitted and provide the following advice.

Landscape

The development is situated within the Llŷn National Landscape / Area of Outstanding Natural Beauty. We note that there is no information regarding landscape assessments with the application and therefore, we are assuming that your Authority has screened the application and concluded that any impacts on landscape are unlikely, and the proposal is in line with Planning Policy Wales. If you require further advice, then please reconsult us.

Protected Species

No ecological information has been submitted in support of this application. We recommend you seek the advice of your Authority's ecologist about the requirement for further information to be submitted in support of the application, and to scope the need for bespoke surveys, where required.

Foul Drainage

The application form indicates the proposals will be connected to the mains sewer. We consider this would be appropriate for this development. The connection must be discussed with the sewerage network undertaker. If the proposal changes so another means of foul drainage is proposed, please re-consult with Natural Resources Wales.

Other Matters The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list. they We advise the applicant that, in addition to planning permission, it is their responsibility to ensure secure all other permits/consents/licences relevant to their

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development. Please refer to our website for further details.

Dŵr Cymru:

Response to the second consultation 21/05/25

Firstly, with respect to the submitted application form and accompanying plans, we acknowledge that the development proposes to discharge foul and surface water flows to a public sewer and soakaway respectively.

Foul Water

The proposed development site is located in the catchment of a public sewerage system which drains to Abersoch Wastewater Treatment Works (WwTW). We have considered the impact of foul flows generated by the proposed development and concluded it is unlikely that sufficient capacity exists to accommodate the development within the immediate public sewerage system without causing detriment to the existing services we provide to our customers, or in regard to the protection of the environment.

Having reviewed the revised Proposed Site Plan, we note it is proposed to re-direct surface water drains from existing buildings from public sewer to new soakaway crate system. However, additional information is required in order to assess whether this would sufficiently offset the new foul flows from the development. Therefore, if minded to grant planning permission, we would request that the condition outlined below is included within any planning consent.

Surface Water

Turning to surface water drainage, as of 7th January 2019, this proposed development may be subject to Schedule 3 of the Flood and Water Management Act 2010. In the event this proposed development amounts to a total impermeable area of 100sqm or more, approval of Sustainable Drainage Systems (SuDS) features will be required in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. In this instance, we offer no objection to proposals for disposal of surface water flows into a soakaway, in principle, subject to consultation and agreement with the regulatory body or riparian owner of this system.

Asset Protection

The site is crossed by a public pressurised main with the approximate position(s) being marked on the attached statutory public watermain record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. Having regard to the revised

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Proposed Site Plan, we note that no alterations to the means of enclosure above and within the protection zone of the public watermain when measured 4 metres either side of the centreline is proposed. Please note, the distance specified for this protection zone is indicative and based on industry standard guidelines. However, the depth of the asset will need to be verified on site which may infer a greater protection zone. For completeness, we recommend the developer refer to their title deeds to confirm if there are any covenants or restrictions associated with the asset(s) crossing the proposed development site.

Notwithstanding this, given the protection zone is located within the site boundary, it is still recommended that the developer contact our Plan and Protect team (PlanandProtect@dwrcymru.com) to carry out a survey to verify the location of the asset(s) and establish their relationship to the proposed development.

Conclusion

Accordingly, if you are minded to grant planning consent for the above development, we would request that the following Condition(s) and Advisory Notes are included within the consent to ensure no detriment to existing residents or the environment and to Dwr Cymru Welsh Water's assets:

Condition

The toilet/shower block hereby approved shall not be brought into beneficial use until a surface water removal strategy delivering sufficient compensation for the foul flows from the proposed development site, is submitted to and approved in writing by the Local Planning Authority in consultation with Dwr Cymru Welsh Water. Thereafter the approved surface water removal strategy will be implemented in accordance with the approved details and written confirmation of this must be received by the Local Planning Authority prior to the beneficial use of the toilet/shower block.

Reason: To prevent hydraulic overloading of the public sewerage system and pollution of the water environment.

No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment

Standard Advisory Notes are also included in the response.

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Fire Service: In connection with your consultation dated 3 February 2025, regarding application C25/0008/39/LL.

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

Public Consultation: A notice was posted on the site and nearby residents were notified. The advertisement period has expired and one item of correspondence was received from the Caernarfonshire Branch of YDCW/CPRW, objecting on the following grounds:

- The site is not well screened.
- The additional hedges will not do much to reduce the harm to the visual quality of the landscape.
- The site is in an open space within the AONB.
- Concern about the site access which is located along a narrow lane.
- A substantial number of caravans within 500m of the site - an excess already and not enough capacity.
- Concern that there will be caravans on the site for the entire season.
- Lack of details in the application about the hard floors and no mention of the play area on plans although it is included in the Design and Access Statement.

5. Assessment of the material planning considerations:

The principle of the development and visual amenities

- 5.1 As there is no planning history for the caravan site, it appears that historically this has been operating as a site with an exemption certificate. Operating as a site of this type will allow up to 5 touring units, therefore it is believed that the two additional units (total of 7 units) are unauthorised and no evidence has been submitted to prove otherwise.
- 5.2 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.
- 5.3 Criterion 1 in policy TWR 5 states that any new touring caravan developments should be of a high quality in terms of design, layout and appearance, and well screened by existing landscape features and / 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.
- 5.4 As explained above, as there is no permission for the 7 existing units, this is considered as an application for a new touring caravan site (15 units). As seen from the plans, it is proposed to install 7 units on the historic exemption site and extending to the adjacent green field with 8 caravans.

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- 5.5 It is stated in the application that trees and extensive hedges conceal the site from every vista. However, from inspecting the site, it is considered that the quality of landscaping on the boundary cloddiau of the site on the whole. Although there are more mature hedges on the northern boundary, the rest of the boundaries are made up of sporadic landscaping. One width of a field separates the site from the county road and relatively bare cloddiau on the eastern boundaries, therefore the site will be prominent from the public road that runs past the property. It is noted that a public footpath is located relatively closely, a field-width of the west of the site also, where view of the caravans is likely. Due to the level nature of the site, it is likely that the views will be restricted but will be prominent from the adjacent road and from higher lands in Bwlchtocyn and from some areas along the area's public footpaths.
- 5.6 It is acknowledged that it is intended to reinforce the site screening by improving and adding landscaping to existing cloddiau, with various native trees. The comments of the Area of Outstanding Natural Beauty (AONB) unit note: "The proposal to plant more trees and create a new hedge on the eastern boundary would, in time, contribute to the site's biodiversity and screening." It is possible enough that the existing cloddiau would screen the lowest parts of the units but due to the height of the touring caravans, it is believed that they would be visible in the broader landscape. By expanding the surface area of the site and increase the number of units from the 5 previous exempt units to a total of 15 units, certainly the site would be prominent in the landscape. The amenity block and ancillary relics that come as a result of caravan site use, such as parking vehicles, play equipment, etc., highlights the presence of the site and is therefore unlikely to contribute positively to the AONB landscape. The village of Bwlchtocyn is in a high area and is prominent where there is high density of historic touring and static caravan sites. There is concern that approving another touring site in the area would harm the visual amenities of the area which is known for its outstanding natural beauty.
- 5.7 Considering the elevated and open location of the site, there is no assurance that the landscaping would establish itself and it is emphasised that it would take many years to adequately screen the site, if at all. A reliance on landscaping to create a sufficient screen includes an element of risk and there is doubt as to whether it would be possible to ensure adequate screening in the short-term. Criterion 1 is clear in the fact that it is requested that sites in non-intrusive sites have been well concealed by the existing features of the landscape and / or in a place where the touring units can be easily assimilated into the landscape. In this case, the site is not well concealed by the existing features of the landscape, and there is no assurance that the mitigation measures to improve the screening would establish or succeed to a degree to conceal and assimilate the units effectively into the landscape. Therefore, the proposal does not meet the requirements of criterion 1 of policy TWR 5 of the LDP.
- 5.8 Policy AMG 1 notes that proposals that are within or affect the setting/views into or out of the AONB, will need to give consideration to the AONB Management Plan. The observations of the AONB unit note "Viewpoints are provided on touring caravans in the AONB in policy TP9 of the Management Plan, which notes: 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 now a substantial number of touring caravans in the community of Sarn Bach / Bwlchtocyn, which puts pressures on the local environment and services."
- 5.9 It is noted in paragraph 6.3.81 of the explanation of policy TWR 5: *"There are areas that are under extreme pressure in a number of communities located on the coast, including large parts of the Areas of Outstanding Natural Beauty. The Council will need strong evidence that proposals for*

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more accommodation units in such areas will not add to problems for services, and will not harm the natural character or resources of these areas."

The Local Planning Authority has a duty to protect the interests of the AONB. Strong evidence was not submitted to prove that the proposal would not add to servicing problems and we have not been convinced that establishing a new touring caravan site in such a sensitive site makes a positive contribution to the vistas and visual amenities of the landscape in this case.

- 5.10 The second criteria of Policy TWR 5 asks to avoid excessive areas of hard standing. In this case, no hard standings are shown for the caravans. There will be a concrete path / ramp for low level access to the toilet/shower facilities; it is believed that this element will be acceptable and will meet the second criterion of Policy TWR 5.
- 5.11 The third criterion requires assurance that the site would only accommodate touring units - this can be controlled with a suitable planning condition, should the decision be made to approve the application. There is concern that the site would go from operating as an unnoticed exempt small site into a more formal site with a tendency in the vicinity to site touring caravans every season.
- 5.12 The fourth criterion requires assurance that any ancillary facilities should be located in an existing building if possible, or should this not be possible, that they are commensurate to the scale of the development. The existing small facilities block in the corner of the second field will be demolished and replaced with a larger-scale new, modern toilet/shower facility block which would measure approximately 12.73m x 3.75m with disabled facilities. The roof will be covered with slate-effect sheets which will be in keeping with other building roofs and the colour of the walls have not been detailed. The existing block would not be of a sufficient size for the number of units and therefore it is believed that the size of the block is equivalent to the scale of the development and satisfies the fourth criteria of criterion TWR 5.
- 5.13 Fifth, the policy requests that the site is near the main roads network and that adequate access can be provided without excessively disrupting the landscape features - the highway matters are discussed below.
- 5.14 The sixth criterion asks to ensure that occupancy is restricted to holiday use only - this can be secured via an appropriate planning condition.
- 5.15 The seventh, and the last of the criteria, requires assurance that the site is used for touring purposes only and that the units are removed from the site during periods when not in use - again, this is a matter of imposing a suitable planning condition.
- 5.16 Although the proposal meets some of the criteria of policy TWR 5 of the LDP, it is considered that the proposal fails on the main criterion which requires that the development is in a non-intrusive location which is already well concealed.

General and residential amenities

- 5.17 Apart from the Berth Ddu dwelling, which is a part of the site, the nearest houses are a field or two away from the application site. Although the proposal extends to an adjacent field, beyond the existing established site, it is not considered that the site of 8 additional caravans would have a substantially different impact on the nearest houses to what is currently experienced. Therefore, it is not considered that the proposal would cause obvious significant harm to the amenities of the local neighbourhood and the proposal is considered to be acceptable in terms of Policy PCYFF 2 of the LDP.

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Transport and access matters

- 5.18 It is proposed to use the existing access to the caravan park to serve the development. It is noted that the access track to the caravan park has already been resurfaced with fine slate waste and work to widen the access has been completed. Widening the access has improved visibility to the road, which is considered satisfactory. The site plan shows parking spaces adjacent to the caravans, with more room for more vehicles if needed. Observations were received from the Transportation Unit which assesses the proposal in terms of the safety of the access and parking, noting no objection. On these grounds, it is accepted that the proposal satisfies the requirements of policies TRA 2 and TRA 4 of the LDP.
- 5.19 It is noted however that criterion 5 of policy TWR 5 requires that touring sites are close to the main roads network and that an adequate access can be provided without substantially disrupting the features and character of the landscape, with Supplementary Planning Guidance - Tourism Facilities and Accommodation noting in para 6.3.1

"It is important that new sites are located as near as possible to the main highways network (i.e. class A and B). Unclassified country roads are usually single-track lanes and are considered unsuitable for heavy traffic. No proposal will be supported when the Authority is of the view that it has not been located close to the main highway network."

The nearest classified road (class 3) abuts the village of Sarn Bach approximately 1.37km from the application site. A narrow unclassified rural road with hidden and winding corners serves the Bwlchtocyn area and there is concern about approving more touring sites where there is a high density of caravan sites as they are on a rural road where passing places are scarce. Certainly, in such a location, visitors would use their own transport to transport a caravan to the site and on the whole are reliant on private transport to travel from day-to-day, as it is not possible to rely on regular public transport here. It can be argued that the Bwlchtocyn area, in particular in the holiday season, has reached a saturation point where no more towing vehicle traffic should be encouraged on the road, which is mainly single-lane. It was noted during the site visit that substantial adaptation work has been done to the access, work that would not require permission, and the work had not been completed at the time. There is concern that the modifications to the access would change the character of the boundaries and the landscaping of the access clawdd is not shown on the amended plan, which is a concern. The introduction of any structures on the access should be avoided and it should be retained as rural in nature to be in keeping with the local area. Due to the nature of the road and its distance from a classified road and the adaptations to the access, it is not believed that the proposal meets criterion 5 of policy TWR 5 of the LDP.

Biodiversity matters

- 5.20 Paragraph 6.2.12 of Planning Policy Wales (Edition 12, 2024) notes that "A green infrastructure statement should be submitted with all planning applications. This statement will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal."
- 5.21 A Green Infrastructure Statement was not submitted as a part of the application but biodiversity enhancements are proposed through landscaping, which includes planting hedges and trees, as well as the installation of a bat box and a bird nesting box on the gable ends of the facilities block. Following observations from the Biodiversity department, amended plans were received, offering to create an area of wildflower meadow.

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- 5.22 A proposal was shown to plant trees on the clawdd near the access in the original plans, but the latest amended site plan does not include planting. It is noted that the Biodiversity Officer considers that the clawdd should be planted with trees, and it is agreed with the comments that this would enhance biodiversity and offer a screen to conceal the proposal. Should the decision be made to approve the application, it would be possible to manage this by means of relevant planning conditions. It is considered that the proposal satisfies the requirements of policy PS19, AMG 5 and Planning Policy Wales (Edition 12, 2024).

Linguistic matters

- 5.23 It is noted that there are some specific types of developments where the proposal will be required to submit a Welsh Language Statement or a Welsh Language Impact Assessment. The thresholds when it is expected to submit a Statement/Report have been highlighted in Policy PS1 of the JLDP as well as 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.
- 5.24 Excluding the developments which meet the thresholds for submitting a Statement / Assessment on the Impact of the Welsh Language noted in Policy PS1, guidance is provided in terms of the types of relevant applications where consideration needs to be given to the Welsh language in Appendix 5 (The Screening Process) of the SPG (part Ch to Dd). The guidance included within Appendix 5 notes that every retail, commercial or industrial development where there is no need to submit a Welsh Language Impact Statement / Assessment should show how consideration has been given to the language.
- 5.25 In this case, a Welsh Language Statement was provided to support the proposal. The applicant notes that the site will only generally be used for holiday use during the 6-month summer period, that the proposal will make a direct and indirect contribution to the rural economy as visitors spend in local pubs, restaurants and shops. The development will involve an initial investment of between £60,000 and £70,000 and contractors and providers should benefit from this. It is anticipated that the development would need one full-time worker to run the caravan site. The site will retain its original Welsh name of Berth Ddu and it is intended for all the site's signage to be bilingual. Some consideration has been given to the Welsh language in line with the principles of the LDP's PS1 policy.

Drainage Matters

- 5.26 Observations were received from Welsh Water on concerns regarding the development. The proposed development intends to discharge foul water and surface water into a public sewer and a new plastic crate soakaway. The development is located within the catchment area of the sewerage system which drains to the Abersoch Water Waste Treatment Work. Welsh Water state that it is unlikely that there will be adequate existing capacity to accommodate the development within the direct public sewerage system without causing harm to services provided to their customers and relating to safeguarding the environment. It is also intended to redirect surface water from the existing buildings from the public sewer into a new crate soakaway system, Welsh Water note that additional information is needed to assess whether this would adequately counterbalance the new foul water produced by the development, therefore, Welsh Water requests that a condition as noted in the above comments are included with any planning permission.

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Other matters

- 5.27 According to the current Welsh Government maps, the land is known as registered land 2, i.e., good quality agricultural 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."*

No evidence has been submitted to justify the loss of quality 2 land as part of the application and therefore it is considered contrary to criterion 6 of policy PCYFF 6, which requests that the best agricultural land is safeguarded, as well as part 3.58 of Planning Policy Wales.

6. Conclusions:

- 6.1 Having weighed up the proposals against the above policy, we conclude that the proposal is contrary to the basic principle of Policy TWR 5, which asks that any touring caravan site development is located in non-intrusive locations which are well concealed by the existing features of the landscape and where they will not cause harm to the visual quality of the landscape, which is within the AONB designation. It is also concerned that the site is not close to the main roads network and for intensifying traffic on unsuitable rural roads which are already under pressure. Although some elements of the proposal are acceptable, it does not outweigh the fact that the proposal fails on the main principle of policy TWR 5. Therefore, there is no option but to recommend refusing the application for the reasons noted below.

7. Recommendation:

- 7.1 To refuse the application - reasons:
1. It is not considered that the proposed units easily assimilate to the landscape and it is not considered as an unobtrusive location that is well-concealed by the existing features of the landscape, so that the development will be harmful to the visual quality of the landscape. The proposal would not add to the maintenance, enhancement or restoration of the recognised character of the Llŷn Area of Outstanding Natural Beauty. There is also concern about creating a new caravan site a considerable distance from the main roads network along a busy rural road where there is a high density of holiday sites and the impact of the associated development work on the features and character of the landscape. Therefore, it is considered that the proposal is contrary to the relevant requirements of Policies TWR 5 and AMG 1 of the Gwynedd and Anglesey Joint Local Development Plan and Supplementary Planning Guidance (SPG): Tourist Facilities and Accommodation.
 2. Insufficient evidence has been presented as part of the planning application to demonstrate that full account has been taken 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.