

**Application Reference:** FPL/2021/38

**Applicant:** Mr Richard Ward-Davis

**Description:** Full application for the siting of 2 glamping pods together with the creation of a new access and associated development on land adjacent

**Site Address:** Gwel y Mor, Treaddur Bay



### Report of Head of Regulation and Economic Development Service (Gwen Jones)

**Recommendation:** Refuse

### Reason for Reporting to Committee

The Local Member called the planning application to the Planning Committee for consideration due to there being a touring park nearby, holiday lets nearby and two shepherd huts in close proximity of the application site.

### Proposal and Site

This is a full application is for the siting of 2 glamping pods together with the creation of a new access and associated development on land adjacent Gwel y Mor, Bae Treaddur Bay.

## Key Issues

The key issue is whether the development complies with local and national planning policies.

## Policies

### Joint Local Development Plan

PCYFF1 (Development Boundaries)  
PCYFF2 (Development Criteria)  
PCYFF3 (Design and Place Shaping)  
PCYFF4 (Design and Landscaping)  
TWR5 (Touring Caravan, Camping and Temporary Alternative Camping Accommodation)  
PS4 - Sustainable Transport, Development and Accessibility  
PS5 (Sustainable Development)  
PS14 (The visitor Economy)  
TRA2 (Parking Standards)  
TRA4 (Managing Transport Impacts)  
PS19 (Conserving and Where Appropriate Enhancing the Natural Environment)  
AMG1 (Area of Outstanding Natural Beauty)  
AMG3 (Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character)  
AMG5 (Local Biodiversity Conservation)

Area of Outstanding Natural Beauty Management Plan

Planning Policy Wales Edition 11

SPG Design Guide for the Urban and Rural Environment

Supplementary Planning Guidance – Holiday Accommodation (Sept 2007) “SPG Holiday Accommodation”

Supplementary Planning Guidance – Tourism Facilities and Accommodation (October 2018).

TAN18 – Transport  
TAN 12 – Design  
TAN5 – Nature Conservation and Planning  
TAN6 – Sustainable Rural Communities  
TAN13 – Tourism  
TAN 23 - Economic

### Response to Consultation and Publicity

Consultee	Response
Cynghorydd John Arwel Roberts	Requested that the application is determined by the planning committee.
Ymgynghoriadau Cynllunio YGC	Standard Comments
GCAG / GAPS	No comments.
Iechyd yr Amgylchedd / Environmental Health	Comments
Uned Polisi Cynllunio ar y Cyd / Joint Planning Policy Unit	Policy Comments

Cynghorydd Dafydd Rhys Thomas	No response
Cynghorydd John Arwel Roberts	A request to call in the planning application to the planning committee for consideration.
Cynghorydd Trefor Lloyd Hughes	No response
Cyngor Cymuned Trearddur Community Council	Comments
Ymgynghorydd Tirwedd / Landscape Advisor	No response
Ymgynghorydd Ecolegol ac Amgylcheddol / Ecological and Environmental Advisor	Conditional Approval
Prifffyrdd a Trafnidiaeth / Highways and Transportation	Conditional Approval
Cyfoeth Naturiol Cymru / Natural Resources Wales	Comments

The proposal has been advertised through the distribution of personal letters of notification to the occupiers of neighbouring properties. The latest date for the receipt of any representation was the 1/4/2021. At the time of writing this report, no letter of representation had been received at the department.

### **Relevant Planning History**

46C/209 – Erection of a dwelling – Refused 13/3/91

46C77 – Alterations and extensions – Approved 14/8/86

46C77A - demolition & rebuild garage & conservatory – Approved 23/6/06

SCR/2020/61 - Screening opinion for the siting of 2 glamping pods together with the creation of a new access and associated development on land adjacent - Gwel y Mor, Bae Treaddur Bay - EIA Not Required

FPL/2020/176 - Cais llawn ar gyfer gosod 2 pod glampio ynghyd a creu mynedfa newydd a datblygiadau cysylltiedig ar dir ger / Full application for the siting of 2 glamping pods together with the creation of a new access and associated development on land adjacent - Gwel y Mor, Bae Treaddur Bay - [object Object] - Gwrthod / Refused

### **Main Planning Considerations**

#### **Policy Considerations**

TWR 5: TOURING CARAVAN, CAMPING AND TEMPORARY ALTERNATIVE CAMPING ACCOMMODATION states:

Proposals for new touring caravan, camping and temporary alternative camping sites, extensions to existing sites or additional pitches will be granted provided they conform to the following criteria:

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 which does not significantly harm the visual quality of the landscape;

Criteria 1 – An unobtrusive location is defined as one which is well screened by existing landscape features and/or where units can be readily assimilated into the landscape without the need for excessive

man made features such as hard-standing and fencing. It is not considered that the application site is unobtrusive as it is an open site with only a limited amount of existing screening.

Supplementary Planning Guidance – Tourism Facilities and Accommodation (unadopted). Even though the SPG is yet to be adopted, it is not considered that the definition of high quality will change. Therefore, High Quality refers to the quality of the development in terms of land-use considerations and not to any recognised grading scheme operated by the tourism industry. In addition to local policy requirements, national policy guidance states that development in rural areas should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas (TAN13: Transport, para 3.11).

Paragraph 3.1.2 of the SPG states that all proposed tourism developments should be high quality in terms of design, layout and appearance. A primary consideration will be the overall quality of the 'scheme', measured against the requirements of the plan's development management policies.

Paragraph 3.1.3 of the SPG provides a criteria which help define high quality development in terms of land use considerations include:

- Sites located in a sustainable location i.e. within or close to existing settlements where new development can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation and sites not normally lying in open countryside unless there is robust justification for this;
  - Sites that are close to the main highway network and have good links to various modes of transport;
  - Sites that are not visually intrusive on the landscape, are well screened and do not cause adverse harm to protected landscapes (e.g. the AONB and SLAs) or heritage assets (e.g. World Heritage Sites and Scheduled Ancient Monuments);
  - Sites that are not located within zone C of the development advice maps (TAN15);
  - Sites that are of a suitable scale to fit in with their surroundings;
  - Sites that have existing landscape cover and no major visual impact;
  - Protecting the undeveloped coast;
  - Protecting and promoting biodiversity interest;
  - Respect for the historic and natural environment;
  - Helps reinforce and strengthen an existing tourism centre and makes better use of land by consolidating areas of existing tourism activity (tourist attractions, marina etc.);
  - Enhancing suitable previously developed (brown field) land;
  - Part of a scheme for agricultural diversification
- Avoids excessive areas of hard standing;

Criteria 2 – There would be a need to avoid any hard standings as part of any proposal.

The proposal involves the creation of a grass road and grass parking area.

Have limited physical connection to the ground and is capable of being removed off the site out of season;

Criteria 3 – Having limited physical connection to the ground and capable of being removed off site out of season. Explanation text 6.3.83 states that when the units are not used during the winter months all units should be removed from the site. In order to ensure minimum impact upon the landscape with proposals for alternative camping accommodation, all structures should be temporary, be capable of being dismantled and moved and should have limited physical connection to the ground. There are no bases proposed for the huts as the pods are on movable wheels. There will be water and electricity points for each pod but drainage will be in a tank underneath the pod and not connected to the existing drainage system.

Any ancillary facilities should, if possible, be located within an existing building or as an extension to existing facilities. If no suitable buildings are available, the need for additional facilities needs to be clearly demonstrated and commensurate with the scale of the development.

There are no ancillary facilities proposed with the development.

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

The application site is close to a main highway network and the highways authority has confirmed that they are satisfied with the proposal with appropriately worded conditions.

Occupation is limited to holiday use.

Since the countryside looks very different during the winter months, should the application be acceptable there would be a condition limiting the operational period of the site to between 1st March and 31st October of the same year.

That the site is used for touring purposes only and any units are removed from the site during periods not in use.

In order to ensure that these temporary structures are being used exclusively for holiday purposes and do not become full time, permanent dwellings and structures should provide basic holiday accommodation. The proposal states that the pods will be removed from the site and stored on the applicant's land next door. The policy states that the units should be removed from the site during periods not in use; even though the proposal states that the pods will be removed off site, they will not be stored within an existing building and will be stored in the open which can be viewed from the main highway and further afield.

Policy PCYFF3: Design and Place Shaping also states that proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environment context and contributes to the creation of attractive, sustainable places. Criteria 1 of the policy states that proposals should complement and enhance the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevational treatment. It is not considered that the proposal complements or enhances the character and appearance of the site.

## **Sustainability**

Policy PS 5 (Sustainable Development) supports development which is consistent with sustainable development principle, where appropriate, development should:

“Reduce the need to travel by private transport and encourage opportunities for all user 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 PS 4;” (Bullet point 12, Policy PS 5)”

This principle is further emphasised by bullet point 4 of PS 14 (The Visitor Economy) which states:

“Supporting appropriately scaled new tourist provision and initiatives in sustainable locations in the countryside through the reuse of existing buildings, where appropriate, or as part of farm diversification, particularly where these would also benefit local communities and support the local economy and where they are in accordance with sustainable development objectives;”

It is considered that the policies contained within the JLDP are consistent with national planning policy in terms of its approach to sustainable development principles. Paragraph 3.35 of PPW (edition 10, December 2018) states,

“In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking 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.”

This is supported by paragraph 3.11 of Technical Advice Note 18: Transport, which states:

“Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas. Most development should be located in places accessible by a range of travel modes.”

The principle of siting new developments in sustainable locations is reiterated the Welsh Government's Building Better Places: Placemaking and the Covid-19 Recovery (July 2020) which states that:

“The planning system needs to support developments which are sited in the right locations, where they can be easily accessed by active and sustainable travel modes without the need for a car. The planning system must ensure the chosen locations and resulting design of new developments support sustainable travel modes and maximise accessibility by walking and cycling. New development should improve the quality of place and create safe, social, attractive neighbourhoods where people want to walk, cycle and enjoy. We should not be promoting sites which are unlikely to be well served by walking, cycling and public transport.”

Paragraph 3.15 of TAN 18 states that tourism proposals, particularly in rural areas, should demonstrate access by choice of modes in order to avoid the necessity to travel by car. In rural areas the lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy of the specific area.

It is acknowledged that the proposal includes electric charging points; however, consideration has been given to the following:-

The proposed development is located along a road without any pavement or lighting provision, the nearest bus stop is located approximately 2.50km on South Stack Road or 3.25km to the nearest bus stop on Porthdafarch Road.

It is acknowledged that there are public right of ways in the immediate vicinity; however, this in itself does not make the site sustainable.

There are no shops in the immediate area, the nearest town which offers a number of services is Holyhead which is located approx. 3.30km away. The development would lead to a significantly increased number of trips by private car to this location and the proposal is not entirely accessible via non-car modes of transport. Due to the site being in open countryside, away from local infrastructure, and the reliance on private transport, it would not constitute a suitable location as required by Strategic Policy PS5, Strategic Policy PS14, Planning Policy Wales and TAN 18

### **Area of Outstanding Natural Beauty (AONB)**

The site is within the AONB in an open location close to the Highway. Gwel y Mor is visible on the approach from Trearddur Bay and on the approach from South Stack where the highway approaches the site from several aspects. The site is an open field enclosure with little boundary screening typical of the immediate area and sloping to the north-east. The property is one of a number of scattered dwellings in this coastal setting.

LANDMAP says of Holy Island (except Mymydd Tŵr) This consists of three parts, separated by areas of development, forming most of the island... It is low-lying with a pattern of low craggy ridges and marshy bottoms... The small roads also follow these alignments along the sides of the ridges, serving the scattered houses and farms and giving access to the popular beaches of the west coast... There are small fields with sheep, stone walls and gorse hedges... The few trees are wind-pruned... There is limited tourist development, with a few caravan/camping sites, but it remains unspoilt, with good views to the coast and to Holyhead Mountain, with a feeling of maritime openness... Overall it has a character and

feeling similar to most parts of westernmost peninsula Britain, including the western part of Lleyn... The quiet atmosphere of this landscape is shattered during weekdays by jets from nearby RAF Valley...

Overall Evaluation is High as a Generally quiet unspoilt rural landscape with attractive mix of rough knolls, marshy and small-scale fields, and coastal views...

The Landscape Character Area description for the area (LCA 2) Holy Island notes that the LCA represents a landscape character that is quite distinctive – rural, wild, exposed, coastal

Issues identified for the Coastal Landscapes in relation to tourism are:

Given the pressure for recreational and tourism developments should take into account:-

- Direct or indirect impact upon coastal landscapes.
- Visual impact on people's perception of the coast, its character and qualities.
- Have regard to the AONB Management Plan.

Main Issues - landscape and visual effects

- Effect on natural beauty, AONB features and special qualities related to landscape.
- Integration within the site context – potentially obtrusive nature of the proposal
- Materials and landscaping

The proposed units are at low density away from the highway but utilising the complete site. New indigenous trees/shrubs are proposed, predominately on the on the boundaries. No specific details are provided but in this exposed location, planting is slow to establish and will take 7-10 years to have any effect.

NRW do not consider the proposal will have a significant effect on the landscape. Seasonal use would have a slight adverse effect on the special quality of peace and tranquillity through the additional traffic and recreational activity associated with the site's proposed use.

Materials and the appearance of the units and parking surfacing, appear suitable; however the layout is open and the units and parking would be visible and visually obtrusive in this open location and be in conflict with the 'unspoilt' nature of the landscape character description and coastal setting. Landscaping would not provide timely mitigation or screen the units.

Highways

The Highways Authority has confirmed that they are satisfied with the development with appropriately worded conditions.

### **Impact upon the amenities of residential properties**

Policy PCYFF2 (criteria 7) states that development will be refused where the proposed development would have an unacceptable adverse impact on the health, safety or amenity of occupiers of local residences, other land and property uses or characteristics of the locality due to increased activity, disturbance, vibration, noise, dust, fumes, litter, drainage, light pollution, or other forms of pollution or nuisance. The closest pod is located within approx. 15m of the boundary of the neighbouring property known as Glan Gorsgoch Uchaf and it is considered that the proposal would have a negative impact upon the amenities of these residential properties due to increased activity of holiday makers coming and going, and noise generation within such a close distance to their property, this would be contrary to the provisions of policy PCYFF2.

## **Conclusion**

The proposal is contrary to the policies of the Joint Local Development Plan.

## **Recommendation**

**(01)The proposed development is located in an isolated open countryside location and it is not considered to be well-sited or high quality development contrary to the requirements of policy PCYFF3, PCYFF4, AMG3 and TWR 5 of the Joint Local Development Plan, Planning Policy Wales (Edition 11), and Supplementary Planning Guidance Tourism Facilities and Accommodation.**

**(02)The local planning authority considers that the development undermines the Welsh Governments commitment to sustainability in terms of its location. The proposal would thus result in isolated and unsustainable development of holiday accommodation in the countryside which would conflict with Strategic Policy PS4 and PS5 of the Joint Local Development Plan, Planning Policy Wales (Edition 11), Technical Advice Note 18: Transport.**

**(03) It is considered that the proposed development would by virtue of noise and general disturbance have an unacceptable impact on the immediate residential properties. This would contravene the provisions of Policy PCYFF2 of the Joint Local Development Plan and Planning Policy Wales (Edition 11).**