

Application Reference: FPL/2023/27

Applicant: John Summerfield

Description: Full application for the change of use of 33 seasonal touring pitches to site 18 static holiday caravans, installation of a package treatment plant together with associated works at

Site Address: Ty Hen Caravan Park, Rhosneigr



**Report of Head of Regulation and Economic Development Service (Colette Redfern)**

**Recommendation:** Permit

**Reason for Reporting to Committee**

The application is a departure from current local policies that we are minded to approve.

**Proposal and Site**

The proposal is a full application for the siting of 18 static caravans in lieu of of a 35 touring caravans together with landscaping works.

The application site forms part of the Ty Hen Caravan Park which lies outside the settlement boundary of Rhosneigr and lies within the designated Area of Outstanding Natural Beauty. The holiday park has a

mixture of static and touring caravan pitches. The site is afforded access off a private road that leads from the A4040.

## Key Issues

The applications main issues are whether the proposed development can be justified with respect to local and national planning policies as the site lies within the designated Area of Outstanding Beauty and the means of access to the site is prone to flooding and whether the proposal will have an impact on the amenities of neighbouring properties.

## Policies

### Joint Local Development Plan

Policy PCYFF 1: Development Boundaries  
Policy PCYFF 2: Development Criteria  
Policy PCYFF 3: Design and Place Shaping  
Policy PCYFF 4: Design and Landscaping  
Policy TRA 2: Parking Standards  
Policy TRA 4: Managing Transport Impacts  
Policy AMG 1: Area of Outstanding Natural Beauty Management Plans  
Policy AMG 3: Protecting and Enhancing Features and Qualities that are Distinctive to the Local Landscape Character  
Policy AMG 5: Local Biodiversity Conservation  
Strategic Policy PS 1: Welsh Language and Culture  
Policy TWR 3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation  
Strategic Policy PS 4: Sustainable Transport, Development and Accessibility  
Strategic Policy PS 5: Sustainable Development  
Strategic Policy PS 6: Alleviating and Adapting to the Effects of Climate Change  
Strategic Policy PS 13: Providing Opportunity for a Flourishing Economy  
Strategic Policy PS 14: The Visitor Economy  
Strategic Policy PS 19: Conserving and Where Appropriate Enhancing the Natural Environment

Supplementary Planning Guidance - Design Guide for the Urban and Rural Environment (2008)  
Supplementary Planning Guidance - Maintaining and Creating Distinctive and Sustainable Communities - July 2019  
Supplementary Planning Guidance - Tourism Facilities and Accommodation - March 2021

Planning Policy Wales (Edition 12, February 2024)

Technical Advice Note 5: Nature Conservation and Planning (2009)  
Technical Advice Note 12: Design (2016)  
Technical Advice Note 13: Tourism (1997)  
Technical Advice Note 18: Transport (2007)  
Technical Advice Note 20: Planning and the Welsh Language (2017)  
Technical Advice Note 23: Economic Development (2014)  
Strategic Policy PS 6: Alleviating and Adapting to the Effects of Climate Change

## Response to Consultation and Publicity

Consultee	Response
Ymgynghorydd Ecolegol ac Amgylcheddol / Ecological and Environmental Advisor	Comments regarding planting

Swyddog Llwybrau Troed / Footpaths Officer	Existing footpath should not be made any narrower by the development.
Ymgynghorydd Treftadaeth / Heritage Advisor	No response to date
Iechyd yr Amgylchedd / Environmental Health	Standard comments regarding environmental and health and safety issues and provided guidance regarding caravan site conditions
Dwr Cymru Welsh Water	Standard comments
Cyfoeth Naturiol Cymru / Natural Resources Wales	No objection and comments regarding foul drainage
Polisi Cynllunio / Planning Policy	Policy comments
Draenio / Drainage	No response to date
Ymgynghorydd Tirwedd / Landscape Advisor	Amended landscaping scheme acceptable
Cynghorydd Neville Evans	No response to date
Cynghorydd Douglas Massie Fowlie	No response to date
Cyngor Cymuned Llanfaelog Community Council	No response to date
Swyddog Cynllunio Argyfwng / Emergency Planning Officer	No response to date

The proposal has been advertised through the posting of a notice on site together with the distribution of personal letters of notification to the occupiers of neighbouring properties. A notice was also placed within the local newspaper. The latest date for the receipt of any representation was the 08/03/23. At the time of writing this report 5 web comments were received. Four of the comments were in support of the proposal and one comment raised concerns of the proposal.

The main issues in support of the proposal were;

- i. Reduction in number of touring caravans/units would lead to reduction in traffic movements and therefore less impact on environment.
- ii. Low impact on AONB due to aesthetics of static caravans

The concerns raised can be summarised as follows;

- i. With the existing static caravans on the site the scheme would result in a second holiday home village with the possibility of 300 people visiting the site
- ii. The application site is on greenfield land
- iii. Site does not benefit from shop, restaurant and therefore visitors would need to travel and can the village accommodate development due to the existing thin infrastructure

In response to these concerns I would state;

- i. The proposal would result in the reduction of units on the site and therefore would be a reduction in the number of people visiting the site
- ii. The site is currently used as a touring caravan site for 10 months of the year
- iii. As stated above the proposal would lead to the reduction of holiday units on the site

### **Relevant Planning History**

V152 - Placing of total number not exceeding twenty nine caravans on OS enclosures nos. 395 and 547, one caravan only on OS enclosure no. 544, the placing of tents on OS enclosures nos. 395, 547 and 544 for occasional use and the erection of three toilet blocks on land at Ty Hen, Rhosneigr - Approved 21/03/62

V152A - Placing of a further 10 caravans on land OS enclosures nos. 395 and 547 at Ty Hen, Rhosneigr to make a total of 40 caravans - Refused 17/6/64

V152B - Siting of 10 holiday caravans on OS enclosure no. 547 at Ty Hen, Rhosneigr - Approved 20/7/66

V152C - Re-siting of a caravan at present on OS enclosure no. 545, Ty Hen, Rhosneigr to a position nearer the existing arm buildings together with the siting of one additional caravan on OS enclosure no. 395 making a total of 41 on the site - Approved 27/5/69

V152D - Siting of an additional 6 touring caravans at Ty Hen, Rhosneigr - A=Refused 17/7/74

28C152 - Darpariaeth system carthffosiaeth ynghyd a gosod offer trin carthion er mwyn gwasanaethu y carafanau presennol yn / Provision of drainage to existing caravans and installation of sewage treatment plant at Ty Hen Caravan Site, Rhosneigr - Approved 03/10/90

28C152A - Diwygio amod (1) ar gais rhif V152C er mwyn cael rhoid 3 carafan symudol ar y safle a codi nifer y carafanau o 41 i 44 yn / Amendment to condition (1) on application no. V152C so as to place 3 touring caravans on site and therefore increase the number from 41 to 44 at Ty Hen Holiday Park, Station Road, Rhosneigr - Refused 11/03/92

28C152B - Dymchwel yr ystorfa presennol ac adeiladu pwll nofio agored y / Demolition of existing storage building and the construction of an open air swimming pool at Ty Hen Holiday Park, Station Road, Rhosneigr - Approved 30/4/93

28C152C - Tystysgrif Defnydd wedi ei sefydlu i gadw 3 carafan symudol ychwanegol yn / Established Use Certificate for the retention of 3 additional mobile caravans at Ty Hen Holiday Park, Station Road, Rhosneigr - Cyfreithlon / Lawful 23/03/93

28C152D - Full application for the erection of a laundry and internet cafe block, siting of 4 static caravans and the re-siting of 2 existing static caravans, installation of package treatment plant together with site improvements at Ty Hen Caravan Park, Rhosneigr - Approved 11/08/15

28C264 - Change of use of tent site with occasional use to a site for both tents and touring caravans on land adjoining Ty Hen, Rhosneigr - Refused 16/07/99

28C264A - Change of use of existing camp site to tents and caravan site on OS enclosure no. 544, Ty Hen Rhosneigr - Refused 14/03/01 - Appeal Allowed 20/08/2001 (no more than 35 units, holiday units only between only between 01/03 and 04/01 in the succeeding year

28C264B - Change of use of outbuilding into a dwelling at The Stable, Ty Hen, Rhosneigr - Approved 22/12/2009

28C264C - Full application for the change of use of land from agricultural land to use for the keeping of horses together with the construction of a manege on land at Ty Hen, Station Road, Rhosneigr - Approved 28/01/2015

## **Main Planning Considerations**

**Policy Context and impact on Area of Outstanding Natural Beauty** - There is no specific planning policy in relation to the change of use of touring pitches to static caravan pitches. However, Policy TWR 3: 'Static Caravan and Chalet Sites and Permanent Alternative Camping'. Criteria 3 of Policy TWR 3 specifically relates to proposals for the improvement of current caravan sites which are located within the Area of Outstanding Natural Beauty.

Planning permission 28C264A, which was allowed on appeal, for the change of use of the existing camp site to tents and touring caravans allowed the use of the site, which forms the current application site, for the siting of no more than 35 touring units between 1st March and 4th January of the succeeding year. This allows the siting of up to 35 units on the land for 10 months of each year.

Minor extensions to the site area of current sites are permissible in accordance with section 3 of Policy TWR3 which states:

Within the Anglesey Coast Area of Outstanding Natural Beauty, Llyn Area of Outstanding Natural Beauty and the Special Landscape Areas proposals to improve existing static and chalet sites by:

- i. Minor extensions to the site area, and / or
- ii. The relocation of units from prominent setting to less prominent locations,

Will be permitted provided that all of the following criteria can be met:

- iii. The improvements does not increase the number of static caravan or chalet units on the site unless, in exceptional circumstances, proposals involve the relocation of existing static and chalet parks that fall within the Coastal Change Management area;
- iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
- vi. In the case of a site located within the Coastal Change Management Area, that the proposed development is part of a scheme to improve safety of occupiers of caravans or chalets;
- vi. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- viii. Is appropriate when considered against other policies in the Plan.

Due to the fact that the application site is located with the AONB and the proposal would result in an increase in number of static caravans on the site the proposal doesn't conform with criteria iii. However, whilst the proposal will lead to an increase in the number of static units on the site the proposal will result in the reduction of units on the site. As stated above the site has an extant permission for the siting of 35 touring caravans between 1st March and 4th January each year.

Since the application site is located within a sensitive area, policy AMG1, AMG3 and AMG4 of the Joint Local Development Plan are also of relevance and will be considered as part of the determination process.

Policy AMG 1 ensures that proposal are considered in line with the relevant Area of Outstanding Natural Beauty Management Plan. Policy AMG 3 ensures that proposal does not have an adverse impact upon features and qualities which are unique to the Local Landscape Character. Policy AMG4 ensures that development on the coast does not cause and unacceptable harm to the built environment, landscape or seascape character.

During a site inspection the existing touring caravans could be seen from the A4080. The touring area has relatively no screening. The proposal will include a landscaping scheme which will reduce the visual impact of the site when viewed from the A4080.

In a recent planning appeal decision, which was allowed for a similar scheme (conversion of 53 seasonal touring caravan pitches to 49 static holiday caravans, along with the re-layout and improvement of the touring area of the park and environmental improvements the Planning Inspector stated; "I acknowledge that the proposal to place static caravans on a year-round basis would alter the permanence and use of that part of the appeal site. However, the degree of change would not be significant given the existing use and limited views to and from that area of the site. Furthermore, the replacement static caravans in this area would be seen in context of adjacent static caravans to the south".

The current application site lies in close proximity to existing static caravan sites, the site currently benefits from planning permission for static caravans and the existing touring site can be used for 10 months of the year. Due to the above and to the proposed landscaping scheme it is not considered that the proposal will have a negative impact on the locality and will improve the visual appearance of the site.

**Flooding** - The access road (A4080) is prone to flooding and a flood consequence assessment has been submitted as part of the application. The access is the only means of access to the applicants dwelling, holiday units and established static and touring caravan site. As the proposal is for the replacement of the existing 35 touring caravan pitch and siting of 18 static caravans it is not considered that the possible flooding of the highway which serves the site will result in a danger to life. Existing public rights of way run through the application site and could also be used to egress the site. Natural Resource Wales have confirmed that they have no objection to the development.

**Ecology** - Strategic Policy PS19 and Policy AMG5 of the JLDP states that proposals must enhance biodiversity, The updated advice in Chapter 6 of Planning Policy Wales (PPW) is to apply a step-wise approach to maintain and enhance biodiversity, build resilient ecological networks, and deliver net benefits for biodiversity. The first priority is to avoid damage to biodiversity in its widest sense and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered. The proposal includes an enhanced landscaping scheme which was to the satisfaction of the Ecology officer and thus it is considered the scheme complies with the requirements of Policy AMG5, the Environment Wales Act and the latest changes to Chapter 6 of PPW. The application was submitted prior to the introduction of the requirement of a Green Infrastructure Statement and thus one has not been requested.

**Welsh Language** - In accordance with the Planning (Wales) Act 2015 Local Planning Authorities have a duty when making a decision on a planning application to have regard to the Welsh language, where it is relevant to that application. This is further supported in Planning Policy Wales (Edition 12) together with Technical Advice Note 20.

The proposal is below the threshold to request a Welsh Language Statement in accordance with PS1: Welsh Language and Culture. However, consideration of the Welsh Language has been received from the applicant.

**Sustainable Development** - Strategic Policy PS4: Sustainable Transport, Development and Accessibility states that development should be located so as to minimise the need to travel. Proposals should improve and maximise accessibility for all modes of transport, but particularly by foot, cycle and public transport. This will be achieved by securing convenient access via footways, cycle infrastructure and public transport, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car.

Strategic Policy PS5: Sustainable Development also states that development will be supported where it is demonstrated that they are consistent with the principles of sustainable development. Criteria 12 states that reducing the need to travel by private transport and encouraging the 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 PS4. Although proposals necessitating the use of private vehicles are not prohibited through the JLDP, Policy PS 5 promotes the application of sustainable development principles in all new developments, including directing development towards the most appropriate locations and reducing the need to travel by private transport.

The site lies within walking distance to the centre of Rhosneigr which has shops, cafes and restaurants. The local train station is situated opposite the application site and the beach and golf club are also located in close proximity. The site is therefore considered to be located in a sustainable location.

**Impact upon adjacent residential properties** - The impact of the proposal, in particular upon the amenity of nearby land users has been considered in accordance with the criteria as set out in Policy

PCYFF2 of the JLDP. The nearest residential dwelling lies 150m to the southwest of the application site. Due to these distances and the fact that the proposal will result in the reduction in the number of units on the site and that the scheme proposes landscaping enhancements it is not considered that the proposal will have any more impact on adjacent residential properties no more than the existing 35 no touring caravans.

## **Conclusion**

Given that the proposal is confined to the existing touring caravan park, and will result in the reduction of the permitted 35 touring caravans to 18 static caravans, the scale and nature of the proposal and improved landscaping scheme the proposal will not have a significant impact on the character or appearance of the surrounding area or the wider landscape and therefore will not have a detrimental impact on the designated Area of Outstanding Natural Beauty.

Whilst the proposal is contrary to criteria iii. of Policy TWR 3 of the Anglesey and Gwynedd Joint Local Development Plan due to the above it is considered that the proposed reduction in the number of units and proposed landscaping scheme will improve the current situation and my recommendation is one of approval.

## **Recommendation**

That the application is permitted subject to the following conditions:

**(01) The development shall begin not later than five years from the date of this decision.**

Reason: To comply with the requirements of Section 91(1) of the Town and Country Planning Act 1990 (as amended)

**(02) The development shall be occupied as holiday accommodation only and shall not be occupied as a person's sole, or main place of residence. An up to date register shall be kept at the holiday accommodation hereby permitted and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all of the occupiers of the accommodation, their main home address and their date of arrival and departure from the accommodation.**

Reason: To define the scope of this permission and ensure that inappropriate uses do not take place in the locality, in accordance with Policy TWR3.

**(03) Prior to the first use of the development hereby approved, full details of the external colour of the static caravans hereby approved shall be submitted to and approved in writing by the local planning authority. The colour scheme agreed shall be retained for the lifetime of the development**

Reason: In the interests of the amenity of the locality

**(04) The site shall be landscaped strictly in accordance with drawing reference Proposed planting details - 2287-A3-07a (received 03/04/2024) in the first planting season after completion or first use of the development, whichever is the sooner. The landscaping scheme shall be retained for the lifetime of the development hereby approved. Any trees or shrubs that are found to be dead, dying, severely damaged or diseased within five years of the carrying out of the landscaping scheme, shall be replaced in the subsequent planting season by trees and shrubs of the same species and size as those originally required to be planted.**

Reason: In the interest of the visual amenity of the locality and to ensure that the development complies with Policy TWR3 of the Joint Local Development Plan

**(05) Prior to the first use of the development hereby approved a scheme detailing all external lighting (which shall include a timetable for its implementation) shall be submitted to and approved in writing by the local planning authority. The scheme shall be designed to ensure that there is no light spillage onto any surrounding land or properties and shall include full details of all lights including luminaire, light spill details, lamp, beam widths, and any anti-glare hoods to be used. The development shall be carried out in accordance with the approved scheme and retained for the lifetime of the development hereby approved.**

Reason: In the interests of the amenity of the locality and in the interest of biodiversity.

**(06) The development hereby permitted shall be carried out in strict conformity with the details shown on the plans below, contained in the form of application and in any other documents accompanying such application unless included within any provision of the conditions of this planning permission.**

**2287-A3-01 - Location plan and existing site plan  
2287-A3-02 - Location plan and proposed site plan  
2287-A3-07a Proposed planting details  
2287-A3-05 - Proposed sectional view  
DSD1292P - Drainage details  
Kingspan Drainage details  
Planning Statement  
Flood Consequence Assessment - Geosmart  
Ecology Report - Kestrel Environmental Services**

Reason: To ensure that the development is implemented in accord with the approved details.

The development plan covering Anglesey is the Anglesey and Gwynedd Joint Local Development Plan (2017). The following policies were relevant to the consideration of this application:

In addition the Head of Service be authorised to add to, remove or amend/vary any condition(s) before the issuing of the planning permission, providing that such changes do not affect the nature or go to the heart of the permission/development.