

JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT IN SUPPORT OF
AN APPLICATION

BY

VALE HOLIDAY PARKS LTD

FOR THE CHANGE OF USE OF LAND BY
UPGRADING 45 TOURING CARAVAN
UNITS TO 45 STATIC CARAVAN UNITS

AT

Llanina Caravan Site

Llanarth

SA47 ONP

Project: Llanina Caravan Site, Llanarth, SA47 ONP
Client: Vale Holiday Parks Ltd
Date: June 2024

DRAFT

JMS Planning & Development Ltd

T: 07395 285 056

E: gwennan@jmsplanning.com

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SECTION 1: INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Vale Holiday Parks Ltd and is submitted in support of an application for the for the change of use of land by upgrading 45 touring caravan units to 45 static caravan units at Llanina Caravan Site, Llanarth, SA47 ONP.

- 1.2 This Planning Report should be read alongside the application drawings which have been submitted. This Planning Report sets out a description of the application proposal, an overview of relevant planning policy and consideration of the relevant planning issues. Accordingly, Section 2 provides an overview of the site and surrounding area, Section 3 provides an overview of the planning history. Details of the application proposal are set at Section 4, whilst an overview of pertinent planning policy is provided at Section 5. The relevant planning issues are set out at Section 6 and the conclusions provided at Section 7.

SECTION 2: SITE AND SURROUNDING AREA

- 2.1 The application site – Llanina Caravan Park – is a caravan park situated to the south of Llanarth, on the coastal side of the A487, some 3 miles inland from New Quay and Aberaeron. The site borders farmland to the south and west, and a mix of commercial, industrial and residential uses to the north. The site is accessed by, and bounded by, the A487 to the east.
- 2.2 The settlement of Llanarth borders the site to the north, serving as the primary service centre for those occupying the application site. A footpath from the Caravan Park entrance leads directly to the settlement.
- 2.3 Llanarth offers a comprehensive range of services, including a church, petrol station, post office, primary school, public house, butcher, convenience store, and garden centre. This renders the application site highly sustainable, fostering safe pedestrian connections and reducing reliance on private transport.
- 2.4 As per the Flood Risk Map from Natural Resources Wales, the application site has small areas with Medium and Low flood risk. The replacement of the existing caravans is not expected to significantly affect the risk of flooding.

SECTION 3: PLANNING HISTORY

- 3.1 A planning history search has been undertaken for the site using Ceredigion County Council's online planning portal.
- 3.2 There are only two pieces of planning history relating to the site. Firstly, the original 1979 permission to allow the use of the site for 45 touring caravans (LPA Ref: 790726).
- 3.3 Secondly, a variance of condition application (LPA Ref: 841039) to allow 15 static caravans in lieu of the touring caravans permitted via permission 790726 was refused in 1984. This refusal was dismissed at appeal in 1985.
- 3.4 We have been unable to source the decision notice, nor appeal decision notice, relating to the above refusal and dismissal respectively.

SECTION 4: THE PROPOSAL

- 4.1 The proposal seeks to the replace the existing 45 touring caravans at the application site with 45 static caravans. Under the new scheme, the development area will remain largely similar to the existing. The north of the site will remain as a green space.
- 4.2 Comprehensive screening will be implemented along the site boundaries, ensuring that the transition to static caravans does not cause any adverse visual or amenity impacts.
- 4.3 As a means to enhance natural screening and improve the environmental quality of the site, a detailed landscaping plan has been drawn up which accompanies the application.

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SECTION 5: PLANNING POLICY

5.1 This Section sets out an overview of national policy and Development Plan guidance relevant to the proposal including policies relevant to design and access matters. The development plan for Ceredigion consists of Future Wales: The National Plan 2040 (Future Wales) and the Ceredigion Local Development Plan (LDP) as no Strategic Development Plan (SDP) has been adopted for Mid Wales.

National Planning Policy

Future Wales – The National Plan 2040

5.2 Policy 2 of Future Wales sets out a series of strategic placemaking principles to shape growth and regeneration in urban areas. Said placemaking principles are:

- Creating a rich mix of uses
- Providing a variety of housing types and tenures
- Building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other
- Increasing population density, with development built at urban densities that can support public transport and local facilities
- Establishing a permeable network of streets, with a hierarchy that informs the nature of development
- Promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders
- Integrating green infrastructure, informed by the planning authority's Green Infrastructure Assessment

5.3 Whilst this policy is primarily focused on shaping growth and regeneration within National and Regional Growth Areas, the principles are also applicable to smaller settlements and should be applied to reflect the local context.

- 5.4 Future Wales notes that thriving, resilient and sustainable rural settlements are characterised by a rich mix of housing, employment, services and infrastructure located in the right places to meet the needs and future aspirations of the population. Moreover, PPW sets out that a broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. In accordance with the supporting text of Policy 4 of Future Wales, different uses should be situated in close proximity to each other, reflecting the strategic placemaking principles, to help create vibrant active places where people can walk and cycle and are less reliant on cars.
- 5.5 It could be argued that the principles of Future Wales do not easily fit into the nature of the built form in Ceredigion as it is a rural County with a heavy reliance on car as there is minimal public transport provision. However, this proposed development is within close proximity to the Rural Service Centre of Llanarth which provides facilities and services such as a shop, school, employment opportunities and play area, which are within walking distance of the Llanina Caravan Park.
- 5.6 The settlement is also served by frequent bus services which link to Aberaeron, New Quay, Cardiff, and Carmarthen.
- 5.7 There are a mix of uses located within close proximity of each other in Llanarth, it is therefore viewed that the strategic placemaking principles are reflected and this is a sustainable location, albeit in a rural context, as envisaged under Future Wales.
- 5.8 Policy 9 of Future Wales sets out requirements in relation to ecological networks and green infrastructure. Action towards securing the maintenance and enhancement of biodiversity to provide a net benefit, the resilience of ecosystems, and green infrastructure assets must be demonstrated as part of the development proposal through innovative,

nature-based approaches to site planning and the design of the built environment.

- 5.9 In line with Future Wales, development must be directed towards sustainable locations and designed to make it possible for people to make sustainable and healthy travel choices for their daily journeys. As highlighted, the proposal would provide an economic boost to the adjoining services of Llanarth. There are ample services and facilities within proximity with no requirement to use the car once the guests arrive at their destination, residents are provided with options to encourage them to make journeys via active and sustainable modes of transport.
- 5.10 The applicant is fully aware that to meet the requirements of Policy 12 that active travel must be an essential and integral component of all new development. New developments should be integrated with active travel networks and, where appropriate, contribute towards their expansion and improvement.
- 5.11 Alternative ways of dealing with cars that encourage a reduction in car use and an increase in active travel and use of public transport should be promoted. Where a new development proposes car parking spaces, these should be located and designed in a manner which enables their conversion to other uses over time. In this scheme car parking has been kept to one side rather than provide an individual space for each apartment, this is to encourage guests to forget about their car for the duration of the holiday and make the most of the walking opportunities along the nearby public rights of ways and to the services available at both service centres.
- 5.12 In line with the Planning and Compulsory Purchase Act 2004, should a policy in Future Wales conflict with a policy in the Ceredigion LDP, then the conflict should be resolved in favour of the policy contained within Future Wales. This is due to Future Wales being the latest document to become part of the development plan.

Planning Policy Wales (Edition 12) (2024)

- 5.13 Planning Policy Wales Edition 12 sets out the vision for Wales as set out in the Well-Being of Future Generations Act; a more prosperous Wales; a resilient Wales which supports healthy, functioning ecosystems and recognises the limits of the global environment; a healthier Wales; a more equal Wales; a Wales of more cohesive communities; a Wales of vibrant culture, and a globally responsible Wales. The document embeds the spirit of the Act by moving towards a low carbon, resilient society, of providing secure and well paid jobs and of building well connected environments for everyone in Wales that improves lives, health and enhances well-being.
- 5.14 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government and is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters which together with the PPW provide the National Planning Policy Framework for Wales (paragraph 1.1).
- 5.15 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and culture wellbeing of Wales as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places (paragraph 1.2).
- 5.16 The PPW promotes action at all levels of the planning process, which is conducive to maximising its contribution to the well being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation (paragraph 1.3).
- 5.17 The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development, with the concept of sustainable

development being at the heart of planning policy since 2002. However, the concept has been expanded under the Well-being Act and it requires improvement in the delivery of all four aspects of well-being; social, economic, environmental and cultural. The Well-Being Act has established seven well-being goals which are intended to shape the work of all public bodies in Wales; a global responsible Wales; a prosperous Wales; a resilient Wales; a healthier Wales; a more equal Wales; Wales cohesive communities; and a Wales of vibrant culture and providing Welsh language.

- 5.18 Paragraph 1.18 confirms that a planned approach is the most efficient way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption in favour of sustainable development in accordance with the Development Plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 5.19 Everyone engaged with or operating within the planning system in Wales must embrace the concept of place making in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities (paragraph 2.1).
- 5.20 For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. The planning system should ensure that the growth of output and employment in Wales is not constrained by a shortage of land for economic uses (paragraph 5.4.1). Tourism plays an important part in the economic development of Ceredigion as a county, and this proposal provides an opportunity to enhance that provision, which in turn will support other local businesses.

5.21 Chapter 6 of the PPW – Distinctive and Natural Places – covers environmental and cultural components of placemaking, more specifically it covers historic environment, landscape, biodiversity and habitats, coastal characteristics, air quality, soundscape, water services, flooding and other environmental (surface and sub-surface) risks.

5.22 In response to the challenges laid down by the Global Biodiversity Framework agreed at COP15, a series of changes were made to Chapter 6, which came into effect on 11th October 2023. The main changes to policy can be summarised as follows:

Green Infrastructure: stronger emphasis on taking a proactive approach to green infrastructure covering cross boundary considerations, identifying key outputs of green infrastructure assessments, the submission of proportionate green infrastructure statements with planning applications and signposting Building with Nature standards.

Net Benefit for Biodiversity and the Step-wise Approach: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A simplified diagram of the policy approach has been developed (which will be further refined in the consolidated version of PPW12). The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.

Protection for Sites of Special Scientific Interest: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a ‘living landscape’. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned

approach may be appropriate where necessary safeguards can be secured through a development plan.

Trees and Woodlands: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place

Technical Advice Notes (TAN)

5.23 The Technical Advice Notes (TANs) provide guidance on a range of specific topics. The pertinent TANs in relation to the application site are considered to be:

- TAN4 - Retail and Commercial Development
- TAN5 - Nature Conservation and Planning
- TAN6 - Planning for sustainable rural communities
- TAN11 - Noise
- TAN12 - Design
- TAN18 - Transport
- TAN20 - The Welsh Language
- TAN22 - Planning for Sustainable Buildings
- TAN23 - Economic Development

5.24 TAN 6 is specific when it comes to building strong rural economies and states that:

“planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment. The development plan should facilitate diversification of the rural economy by accommodating the needs of both traditional rural industries and new enterprises, whilst minimising impacts on the local community and the environment.”

5.25 TAN 23 - Economic Development mirrors the aspirations of TAN 6 in the need to build strong rural economies by virtue of allowing land for economic uses, and it specifically state that: “development on

unallocated sites could be permitted if the resulting benefits outweigh any adverse impacts of the development.”

Local Planning Policy

- 5.26 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.27 The Development Plan comprises of Ceredigion Local Development Plan 2007-2022 and accompanying Supplementary Planning Guidance's.
- 5.28 Policy S01 – Sustainable Growth states that in terms of employment opportunities to provide for 4000 jobs across the County in a sustainable manner and there is the option of looking at sites that have not been allocated.
- 5.29 Although the application site falls just outside of the Llanarth Rural Service Centre Settlement Boundary, for the purposes of this application, the proposal is considered against Policy S03 (Development in Rural Service Centres). The policy acknowledges the more rural context of RSCs over USCs, and thus opportunity is additionally provided for development types other than general housing to also come forward beyond the boundary if suitable locations are not available within the boundary
- 5.30 The LDP acknowledges that Tourism is one of the County's main employment sectors.
- 5.31 Policy LU14 (Countywide Tourism Accommodation Sites: Static and Touring Caravans, Camping pitches, Cabins and Chalets) states that for developments within the Coastal Area (as the application site is), no additional units relating to static caravans, touring caravans, cabins and

chalets will be permitted. The policy goes on to state that the extension, enhancement or upgrading of existing sites that does not propose an increase in the number of units/pitches, will be permitted where there would be overall improvement to the environmental quality of the site and where there would be a reduction of its impact on the surrounding landscape.

5.32 The Policy explains in paragraph 7.86 that the coastal areas will continue to be defined as the land on the seaward side of the Trunk Road (A487).

5.33 With regards to impact on the landscape, Policy DM17 (General Landscape) suggests that development will be permitted provided that it does not have a significant adverse effect on the qualities and special character of the visual, historic, geological, ecological or cultural landscapes and seascapes of Ceredigion, the National Parks and surrounding area by:

1. causing significant visual intrusion;
2. being insensitively and unsympathetically sited within the landscape;
1. introducing or intensifying a use which is incompatible with its location;
2. failing to harmonise with, or enhance the landform and landscape; and /or
3. losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes.

5.34 This scheme is considered to produce a negligible impact on the landscape. The current site benefits from effective screening due to its abundant boundary vegetation, which will be maintained and moreover significantly enhanced. Consequently, there will be no discernible impact when observed from outside the site.

5.35 Regarding public rights of way (PROW), the map below illustrates Footpath 51/51 situated to the north of the site, and Bridleway 51/52 running along the southern perimeter, serving as a thoroughfare to Llanarth Centre. These pathways will remain unaffected by the proposal. The change from touring caravans to statics will be minimal in terms of their impact on the PROW as a large number of the touring caravans are situated on site throughout the year and come with their own decking and paraphernalia.



Source: Ceredigion County Council

SECTION 6: PLANNING ISSUES

6.1 This Section of the supporting Planning Statement sets out an overview of the general planning issues which are considered relevant in the consideration and determination of this application. Accordingly, the following general planning matters are considered below:

- The principle of the development;
- Job creation;
- Visual Impact;
- Amenity; and
- Highway safety and parking.

Principle of Development

6.2 Local Development Plan (LDP) Policy LU14 indicates that in the coastal areas no additional units relating to static caravans, touring caravans, cabins and chalets will be permitted. The policy also indicates that the extension, enhancement or upgrading of existing sites will be permitted where there would be overall improvement to the environment quality of the site and where there would be a reduction of its impact on the surrounding landscape. The Policy explains in paragraph 7.86 that the coastal areas will continue to be defined as the land on the seaward side of the Trunk Road (A487). The appeal site lies within this coastal area and therefore no additional units in such areas are permitted.

6.3 Given the proposal does not seek to introduce any additional caravan units on the application site, but instead merely replace the existing touring caravans with static caravans, it is not considered there is any conflict with Policy LU14 as there are no increase in units. Whilst the change of use of existing camping pitched to touring caravan pitches is not permitted there is no policy objection to the change from touring caravans to static caravans in the coastal area.

- 6.4 Furthermore, as the application site is an existing established lawful caravan site, there should be no concerns about the saturation of this type of proposed accommodation as there would be no difference in the number of caravans permitted on the site to that of the fall-back situation. In addition the way in which the site is currently used means that the touring caravans are permanently positioned on the site.
- 6.5 The applicant acknowledges that the original decision notice (D1/726/79) for the site describes it as a touring caravan site. However, there is no distinction between a touring and static caravan as defined under Section 29 (1) of the Caravan Sites and Control of Development Act 1960 of the Caravan Sites and Control of Development Act 1960 and as amended by Section 13 (1) of the Caravan Sites Act 1968; and the dimensional changes applicable to caravans made by the 2007 Order mean that a 20m by 6.8m caravan could legitimately be sited in lieu of each touring caravan.
- 6.6 It is therefore considered there is no conflict with Policy LU14 (1a) which states that no additional units relating to static caravans, touring caravans, cabins and chalets will be permitted. This argument is wholly supported by appeal decision Ref: APP/D6820/A/15/3063783, which allowed the changing the use of land by upgrading from 100 touring caravan units to 100 static caravan units within the Ceredigion County Council administrative boundary.
- 6.7 The proposal seeks the siting of all-year round permanent static caravans which would mean that during the closed-season instead of a closed site there would be all-year round economic benefit the area, avoiding seasonality. The impact of this change is further considered in the Visual Impact section below.

Job Creation

- 6.8 The application proposal will provide a valuable source of jobs, retaining employment in a rural area and bring a wide range of economic benefits and accord with the role and focus of providing sustainable communities in line with Future Wales, PPW and the adopted Ceredigion Local Development Plan.
- 6.9 Staffing on site will comprise circa four full time jobs, making a contribution and providing job opportunities locally. Staff will be required for management, garden maintenance and general maintenance.

Visual Impact

- 6.10 Policy LU14 notes that the extension, enhancement or upgrading of existing caravan sites that do not propose an increase in the number of units/pitches will be permitted where there would be overall improvement to the environmental quality of the site and where there would be a reduction of its impact on the surrounding landscape.
- 6.11 With the provision of new uniform static caravan units and well-kept communal areas the scheme would most definitely enhance the environmental quality of the site as it currently stands along with further mitigating the impact on the surrounding landscape with the additional planting as set out in the landscaping scheme.
- 6.12 In addition, given the site's existing heavy screening from the surrounding landscape, as displayed below, it is argued that replacing the existing touring caravans with static caravans would be indiscernible unless observed from within the site itself.



Figure 1. Satellite view of the application site, with existing heavy vegetation along the site's boundary visible.

- 6.13 From the nearest Public Right of Way (PROW), the current use of the site cannot be determined, nor would it be discernible if the caravans were replaced with static ones.
- 6.14 Therefore, the scheme will improve the environmental quality of the site and reduce its impact on the surrounding landscape, as such a pragmatic approach is warranted. The deviation from LDP LU14 is minor, with negligible harm in the context of this specific site.

Amenity

- 6.9 The proposed scheme has been developed along the paths and pads of the existing tourers therefore there will be no adverse impact on any surrounding sites as the caravans are not positioned any closer to the existing. The substantial distance between the site and surrounding built up areas ensures that the quality of life for future occupants of the application site will not be adversely affected by their activities or vice versa.
- 6.15 Overall, there will be no unacceptable impact on amenity. As such, it is considered that the development is fully compliant with Policy DMO6 – High Quality Design and Placemaking.

Highway Safety and Parking

- 6.16 Since the proposed scheme maintains the same number of caravans, no increase in traffic generation from the site is anticipated.
- 6.17 However, the proposal does aim to allow year-round occupation of the site, resulting in increased traffic movements during the winter months (when the site as existing would be unoccupied). Considering that the winter months typically experience lower traffic volumes, the slight increase as a result of the static caravan replacement should be manageable for the local road network.
- 6.18 As such, the proposal is in line with adopted Policies DMO6 and TAN 18.

SECTION 7: CONCLUSIONS

- 7.1 The submitted application seeks full planning permission for the change of use of land by upgrading 45 touring caravan units to 45 static caravan units at Llanina Caravan Site, Llanarth, SA47 ONP.
- 7.2 The proposed development aligns with Policy LU14 insofar that it does not introduce additional caravan units, instead simply seeking to replace existing touring caravans with static caravans.
- 7.3 The application seeks to upgrade an existing caravan site with a scheme which will result in an overall improvement to the environmental quality of the site and where there would be a reduction of its impact on the surrounding landscape.
- 7.4 The current site benefits from effective screening due to its abundant boundary vegetation, which will be maintained. Consequently, there will be no discernible impact as a result of the application, when observed from outside the site. The site is currently well-hidden and sits below the vantage points within the surrounding landscape.
- 7.5 The proposal would generate a much needed financial boost and result in a year-wide positive impact on neighbouring businesses in Llanarth, helping to secure their future.
- 7.4 Based on the above it is requested that planning permission is forthcoming for this proposal.