



JMS PLANNING & DEVELOPMENT

PLANNING STATEMENT IN SUPPORT OF
AN APPLICATION

BY

PENRHOS PARK

FOR THE RETENTION OF THE
REPOSITIONING OF 36 STATIC
CARAVANS AND 15 LODGES

AT

Penrhos Park
Llanrhytud
Ceredigion
SY23 5AY

Project: Retention of the Re-positioning of 36 Static Caravans and 15
Lodges
Client: Penrhos Park
Date: February 2025

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SECTION 1:INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Penrhos Park and is submitted in support of an application for the retention of the repositioning of 36 static caravans and 15 lodges at Penrhos Park, Llanrhystud SY23 5AY.
- 1.2 Planning Permission was granted for the 36 static caravans and 15 lodges under planning references A190622 and A140092 respectively. However the layout of what was approved has not been followed, hence why this application is being submitted for the retention of the location of the units within the park.
- 1.3 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 – Penrhos Park – is located on the outskirts of Llanrhystud. Llanrhystud is designated as a Rural Service Centre under the Ceredigion Local Development Plan and is within walking distance of this site. The site provides holiday accommodation, golfing experiences, hotel, restaurant, bar and leisure facilities. The site is easily accessible from the A487 trunk road. The site is well-screened and nestled into the valley – the only view point of the site is for a short distance along the B4337.
- 2.2 Penrhos Park has developed to become a prime holiday destination and contributes extensively to the local economy in terms of employment and disposal income. As previously stated the 36 static caravans were granted planning permission under application reference A190622 and the 15 lodges under application reference A140092. The plan below shows the static caravans permission in pink and the lodges caravan application in yellow, as approved by the local planning authority. As you can see from their location on the ground, the applications layout overlap each other, therefore they could have never been implemented in accordance with both permissions.

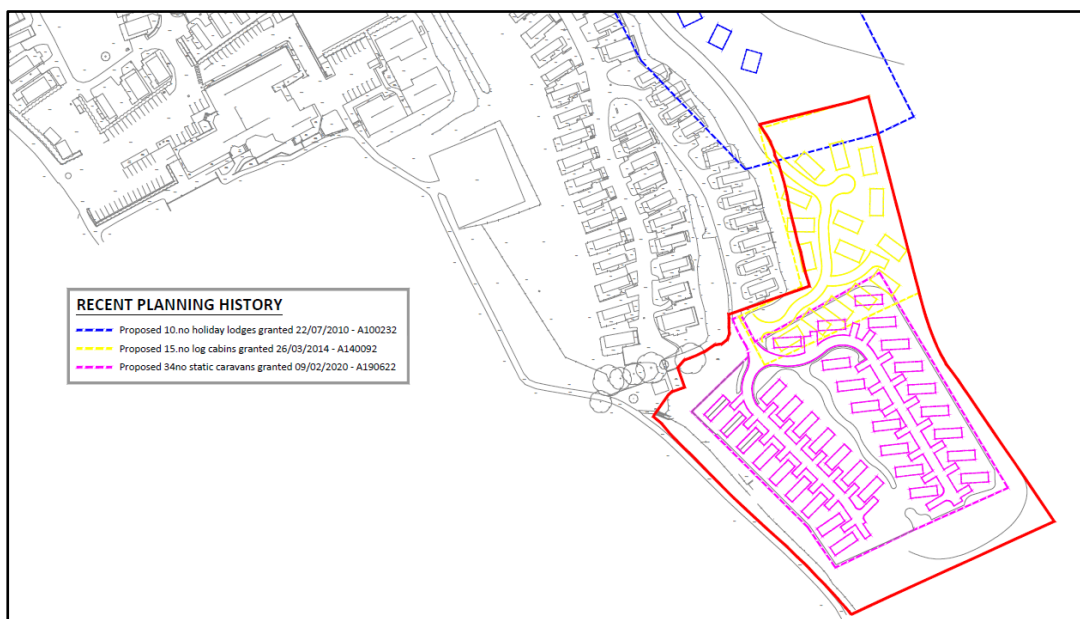


Figure 1: Layout of approved permissions

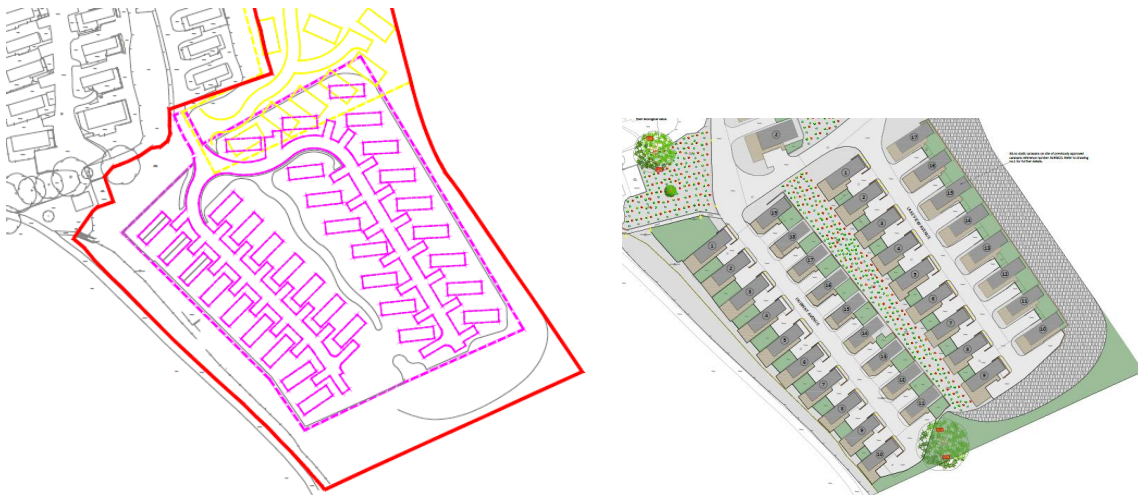
- 2.3 Llanrhystud offers a comprehensive range of services, including a church, petrol station, post office, primary school, public house, pizzeria and convenience store. This renders the application site highly sustainable, fostering safe pedestrian connections and reducing reliance on private transport. A regular bus service also runs through Llanrhystud.
- 2.4 As per the Flood Risk Map from Natural Resources Wales, the application site sits entirely outside of the flood zone. Therefore there is no risk of flooding in this case.
- 2.5 There are no public rights of way running through the site, but there is a footpath which adjoins the park – no. 28/8 which leads through the Pitch and Putt Course, across Afon Wyre and down past Maes Carrog which then leads safely into the services in Llanrhystud. This footpath will remain unaffected by the development.

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 Planning permission was granted under reference A100232 for the Erection of 10 No. Holiday Lodges, associated infrastructure works and landscaping approved on the 23rd July 2010 – this is located to the Northern area of the application site.
- 3.3 Within the applications site, planning permission was granted on the 26th March 2014 under planning reference A140092 for 15 lodges. In addition permission was granted on the 9th December 2020 under planning reference A190622 for the siting of 36 static caravans.

SECTION 4: THE PROPOSAL

- 4.1 The proposal seeks retrospective planning permission for the resitting of 36 static caravans and 15 lodges located within the confines of Penrhos Park.
- 4.2 The 36 static caravans were originally sited in four rows with two spine roads servicing them as defined in pink on the first plan below. In comparison, the static caravans have been positioned perpendicular to each other along two spine roads. The changes are not so much in relation to their location but more so to do with the way they are orientated. 17 are located along Lakeview Avenue and 19 are located along Fairview Avenue.



- 4.3 The second element of the proposal seeks retrospective permission for the relocation of 15 lodges granted under planning permission A140092, the plans below yet again demonstrate where the original approval was granted (yellow) and then a plan showing their exact location on site.



4.4 The most notable changes here are the orientation and layout of the lodges, being in a linear form, following the layout of the caravans beneath. The site has also encroached slightly to the Northern end. The layout is uniform and the access road is smaller and it links up with the lodges granted to the Northern area of the site.

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 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.
- 5.3 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 Llanrhystud which provides facilities and services such as a shop, school, retail, employment opportunities and play area, all within walking distance of Penrhos Park.

- 5.4 The settlement is also served by frequent bus services which link to Aberaeron, Aberystwyth, Cardiff, and Carmarthen.
- 5.5 There are a mix of uses located within close proximity of each other in Llanrhystud, 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.
- 5.6 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.
- 5.7 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 in Llanrhystud. There are ample services and facilities on site and 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.
- 5.8 The applicant is fully aware that to meet the requirements of Policy 12 t 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.
- 5.9 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 that enables their

conversion to other uses over time. In this scheme car parking has been provided as individual space for each unit, however, guests are encouraged to make the most of the walking opportunities along the nearby public rights of ways and to the services available in Llanrhystud.

- 5.10 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)

- 5.11 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.
- 5.12 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).
- 5.13 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).

- 5.14 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).
- 5.15 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.
- 5.16 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).
- 5.17 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.

5.18 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)

5.19 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
- TAN13 – Tourism
- TAN18 – Transport
- TAN20 – The Welsh Language
- TAN22 – Planning for Sustainable Buildings
- TAN23 – Economic Development

5.20 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.”

5.21 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.”

5.22 TAN 13 relates specifically to Tourism and states that “New and extended sites should be effectively screened, and planned so as not to be visually intrusive. Sites should not as a rule be allowed immediately by the sea,

but should be set back a short distance inland where they are not visible from or along the coast.”

Local Planning Policy

- 5.23 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.
- 5.24 The Development Plan comprises of Ceredigion Local Development Plan 2007-2022 and accompanying Supplementary Planning Guidance's.
- 5.25 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.
- 5.26 Although the application site falls just outside of the Llanrhystud 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.
- 5.27 The LDP acknowledges that Tourism is one of the County's main employment sectors.
- 5.28 Policy LU14 (Countywide Tourism Accommodation Sites: Static and Touring Caravans, Camping pitches, Cabins and Chalets) states that for developments outside of the Coastal Area (as the application site is), extension to existing sites will be permitted providing that a “Tourism

Needs and Development Impact Assessment” is submitted; and that any new facilities required due to the extension does not affect the vitality of facilities already offered within the nearest settlement.

5.29 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;
3. introducing or intensifying a use which is incompatible with its location;
4. failing to harmonise with, or enhance the landform and landscape; and /or
5. losing or failing to incorporate important traditional features, patterns, structures and layout of settlements and landscapes.

5.30 This scheme is considered to produce a negligible impact on the landscape. The current site benefits from effective screening due to its location within a defined valley – Cwm Mabws. The proposal is also a retrospective application of developments which were already deemed acceptable in principle in this location albeit in a different layout. The landscaping provides enhanced biodiversity and in time it will allow the development to nestle into its surroundings. Consequently, there will be no discernible impact when observed from inside the site or from public viewpoints.

SECTION 6: PLANNING ISSUES

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

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

Principle of Development

6.2 Local Development Plan (LDP) Policy LUI4 indicates that outside of the coastal areas extension to existing static, cabin and chalet sites will be permitted subject to a Tourism Impact and Needs Assessment (TINA) being submitted and that the scheme will not affect the vitality of services provided in the nearest settlement.

6.3 This application is not accompanied by a Tourism Impact and Needs Assessment as the principal of the developments have already been established under previous planning permissions and this application seeks to retain the siting of the lodges and static caravans. In terms of criterion 2.b.ii there will be no additional facilities provided as part of the proposal and as such the situation will remain unchanged.

Visual Impact

6.4 In terms of visual impact, again these units were granted planning permission previously therefore would have had the same amount of impact on the landscape as now. With the provision of static caravans and lodge units in situ and well-kept communal areas it enhances the environmental quality of the site along with further mitigating the impact on the surrounding landscape with additional extensive green areas and

planting as set out within the proposed block plan and accompanying Green Infrastructure Statement.

- 6.5 The nearest Public Right of Way (PROW) is located adjacent to the site, and therefore the views from it are already compromised. The proposed development will not result in an adverse effect on the way the PROW is enjoyed.

Amenity

- 6.6 The lodges and statics are already in situ and have not caused any amenity issues in terms of noise or significant disturbance to any nearby residential properties. Residential properties are located at a significant distance from this proposed site. 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.
- 6.7 Overall, there will be no unacceptable impact on amenity. As such, it is considered that the development is fully compliant with Policy DM06 – High Quality Design and Placemaking.

Highway Safety and Parking

- 6.8 There will be a negligible increase in traffic generation to and from the site and the proposal will allow year-round occupation of the site. The units are already in use. Considering that the winter months typically experience lower traffic volumes, the slight increase as a result of the development should be manageable for the local road network.
- 6.9 As such, the proposal is in accordance with adopted Policy DM06 of the LDP and TAN 18.

SECTION 7: CONCLUSIONS

- 7.1 The submitted application seeks full planning permission for the retention of the re-positioning of 15 holiday lodges and 36 static caravans at Penrhos Park, Llanrhytsud.
- 7.2 The proposed development aligns with Policy LU14 insofar that it is an extension of an existing site located outside of the coastal zone. There is continued demand for additional types of holiday accommodation to lease on this site. The principal of the developments have already been established under planning permissions A140092 and A190622 which were also assessed under the current Local Development Plan.
- 7.3 The proposal is complete and has nestled into its surroundings well, providing high quality tourism accommodation.
- 7.4 The proposal generates a financial boost and result in a year-wide positive impact on neighbouring businesses in Llanrhystud, helping to secure their future.
- 7.5 Based on the above it is requested that planning permission is forthcoming for this proposal.