

# CADNANT

PLANNING

**Gorse Hill Caravan Park and Lodge Park,  
Llanrwst Road, Conwy LL32 8HJ**

**DRAFT DESIGN, ACCESS AND PLANNING  
STATEMENT**

Gorse Hill Caravans Ltd.

August 2023

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## Design, Access and Planning Statement



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# 1. Introduction

- 1.1 This Draft Design, Access and Planning Statement accompanies a draft planning application for the demolition of two existing dwellings and siting of 22 static caravans, creation of pitches, construction of internal private access road, creation of parking spaces, connection to existing private sewage treatment plant and landscaping on land at Gorse Hill Caravan and Lodge Park, Llanrwst Road, Conwy. The caravans will be used for holiday accommodation, other than two of the twin-unit caravans/lodges which will be used as residential units in lieu of the two proposed demolished dwellings.
- 1.2 This scheme will provide significant investment into the park and this proposed minor extension to the park will assist in further job creation; create additional tourism expenditure and provide a catalyst for further investment on the park.
- 1.3 This statement identifies the context of the site, sets out the proposal, discusses the relevant planning policy guidance and principle of the development, and assesses the main considerations which support the proposed development.
- 1.4 As required by the Town and Country Planning Development Management Procedure (Wales) (Amendment) Order 2016 this statement will address the following matters:
  - a) Explain the design principles and concepts that have been applied to the development;
  - b) Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
  - c) Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and,
  - d) Explain how any specific issues which might affect access to the development have been addressed.
- 1.5 This Design, Access and Planning Statement should be read in conjunction with the supporting plans, Landscape and Visual Impact Assessment, landscaping proposals and Ecological Survey and Arboricultural Statement.
- 1.6 The proposals have been prepared taking full account of The Well-being and Future Generations (Wales) Act 2015 and it is considered that the proposals are in

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accordance with the seven well-being goals and will constitute sustainable development in line with guidance set out in Planning Policy Wales (PPW) Ed.10, 2018.

- 1.7 The adopted development plan consists of the Conwy Local Development Plan (LDP) 2007-2022, which was adopted in 2013.

## 2. The site and context

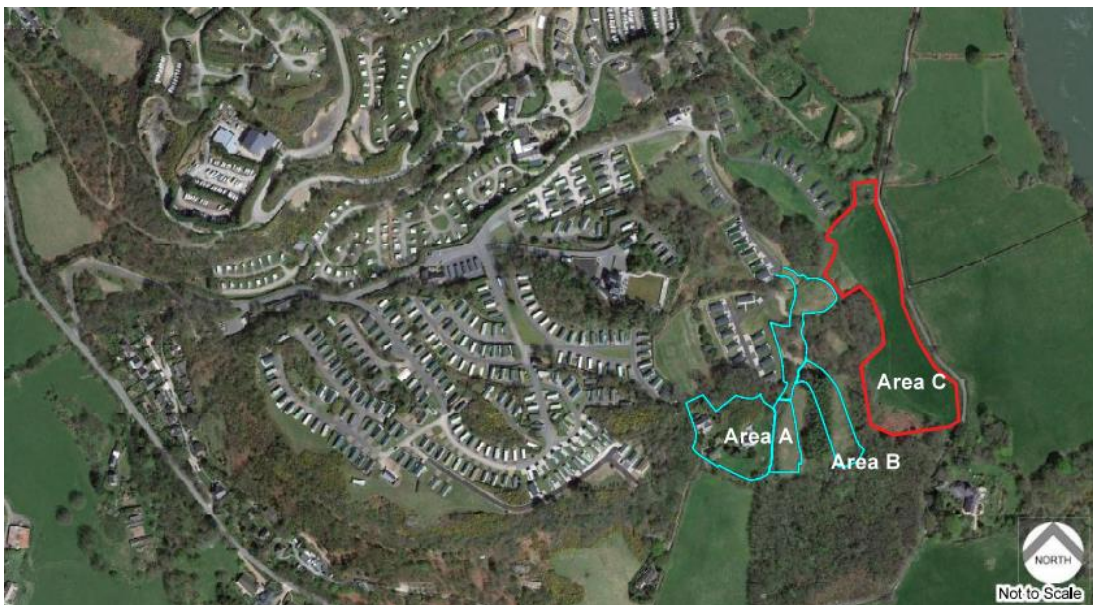
- 2.1 The site has long been identified as the Gorse Hill Caravan and Lodge Park established in 1954, and now run as a privately-owned park of exceptional quality, on the outskirts of the walled-town of Conwy, the park is within easy reach of the countless attractions and activities on offer in Conwy and the wider north Wales Region.
- 2.2 The site access is off the B5106, though caravan pitches are not immediately visible from the B5106. There are fine views from the higher parts of the site over the Conwy Valley. The existing static caravan and lodge park is spread over a large site but is well landscaped and screened from the surrounding countryside. There are currently 270 luxury static caravans / lodges on the Gorse Hill site.
- 2.3 Gorse Hill provides an excellent high-quality environment and experience for visitors. The site benefits from The Manor Bar and Restaurant which is a 5 star food and drink venue. Caravans and lodges have been sited at low densities on the land to allow for a higher quality of development and to provide a more open and attractive layout.
- 2.4 The Gorse Hill site is of exceptional quality both in terms of its high-quality accommodation, its landscaped setting and its accessibility to local services. The proposed scheme would be well contained by existing landscape features and can be of significant benefit to the local and rural economy.
- 2.5 The site has won the David Bellamy Gold Award for Conservation. This is awarded for the work done to the protect and enhance Britain's natural environment. Gorse Hill has also been showcased by the British Holiday & Home Parks Association holding their AGM at the site to demonstrate high quality parks. The site has also received the Woodland Badge, and is recognised as a Honey Bee Friendly Park, following extensive implementation of biodiversity enhancements under the current ownership.
- 2.6 The area surrounding the Gorse Hill site is predominately amenity woodland and land in agricultural use, with the exception of the adjoining Caravan Site to the immediate north of the site which has a mix of statics and touring units.
- 2.7 Caravan and mobile home parks are an existing and accepted part of the rural landscape in Wales and Conwy; provided that views of them are glimpsed and provided that they sit comfortably within their setting. This is certainly the case with Gorse Hill where the site is well screened and barely visible in the wider landscape,

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in stark contrast with many of the more expansive, regimented caravan park developments in other parts of the County.

- 2.8 The application site is on land adjoining the existing site and would form a reasonable extension to the existing park. Figure 2.1 below broadly identifies the area of the application site, where new pitches would be sited in in red and blue, in the context of the park. There are caravans directly backing onto this area. As can be seen from the aerial imagery, there are existing groups of trees along the site boundary intervening between the proposed units and the wider landscape.
- 2.9 The draft application has been informed by a detailed Landscape and Visual Impact Assessment, which has ensured that the proposal becomes as well assimilated into the landscape as the existing park.

*Figure 2.1 Aerial Image identifying the application site in red*



### 3. The proposed development

- 3.1 The proposed development is for the demolition of two existing dwellings and siting of 22 static caravans, creation of pitches, construction of internal private access road, creation of parking spaces, connection to private sewage treatment plant and landscaping on land at Gorse Hill Caravan and Lodge Park, Llanrwst Road, Conwy.

#### Design

- 3.2 The relevant design policies which have been taken account of in designing the proposals are as follows (a summary of the policy wording is detailed in the Section 4 'Policy context'):

- Planning Policy Wales Ed. 10;
- TAN 12 - Design;
- DP/3 – Promoting Design Quality and Reducing Crime;
- DP/4 – Development Criteria;
- TOU/1 – Sustainable Tourism;
- TOU/4 - Chalet, Caravan and Camping Sites;
- NTE/1 – The Natural Environment; and,
- NTE/3 – Biodiversity.

***The design principles and concepts which have been employed are as follows:***

- Ensure that built development scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality;
- Ensure community safety and security in the design and layout of development and public / private spaces;
- Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality;
- Ensure convenient access to public transport facilities, and clear and well-defined links to pedestrian and cycle routes;
- Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development;
- Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats;



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- Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area;
- Manage trees in a way that adds character to the site but also integrates the site to the wider area;
- The proposed development should be sited in such a way that it doesn't affect the amenities of surrounding properties or obstruct views / sunlight into other properties.
- The layout of the site should aim to accommodate the units in the most efficient way as to make the best use of the space on site;
- The proposed development should not have any impact on the character or historic value of the existing buildings;
- Noise pollution should be reduced through high quality design and materials in order to reduce effects on neighbouring properties.

### Use

- 3.3 In terms of use the lodges (which comply with the definition of static caravans); they are intended to be used for holiday purposes only, but with two of the units retaining residential use in lieu of the two dwellings to be demolished as part of the proposal.

### Scale

- 3.4 The size and scale of caravans will be as set out in Section 13(2) of the Caravan Sites Act 1968. Following recent amendment to allow for improved energy efficiency and insulation the maximum size has been changed to:
- (i) length (exclusive of any drawbar); 20 meters;
  - (ii) width: 6.8 meters; and,
  - (iii) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 3.05 meters).

### Layout

- 3.5 The layout of the site provides for each lodge to have parking spaces for two cars, together with a raised deck area and also to far exceed the minimum separation distances required to comply with site license requirements. This is in line with the park's principles of achieving high quality and also maintaining a well landscape setting and allowing for further biodiversity enhancements. There are no parking standards relating to static caravans or lodges in the Council's SPG Parking Standards. The proposal includes ample parking space for two cars alongside each

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unit. This is consistent with the level of parking across the site and is therefore considered acceptable. All roads have been designed to be kerbless to provide a rural appearance to the site. The retaining wall structures have all been sited sensitively and surrounded by existing and proposed landscaping.

### Appearance

- 3.6 The overall appearance of the units are to consist of similar external appearance to existing lodges, finished in a pallet of environmental colours with effective use of glazing being made to ensure a sustainable form of development allowing maximum level of natural lighting into the caravans with overhanging eaves to avoid glare. The colour of the lodges has been carefully chosen to tone in with the immediate environs and vegetation, as has been successfully achieved by other recent developments within Gorse Hill. An example of the environmental colours used on site are detailed in Figures 3.1-3.5 .

*Figure 3.1 Photograph identifying indicative external appearance of the caravans*



*Figure 3.2 Photograph identifying indicative external appearance of the caravans*



*Figure 3.3 Photograph identifying indicative external appearance of the caravans*



*Figure 3.4 Photograph identifying indicative external appearance of the caravans*



*Figure 3.5 Photograph identifying indicative external appearance of the caravans*



## Landscaping

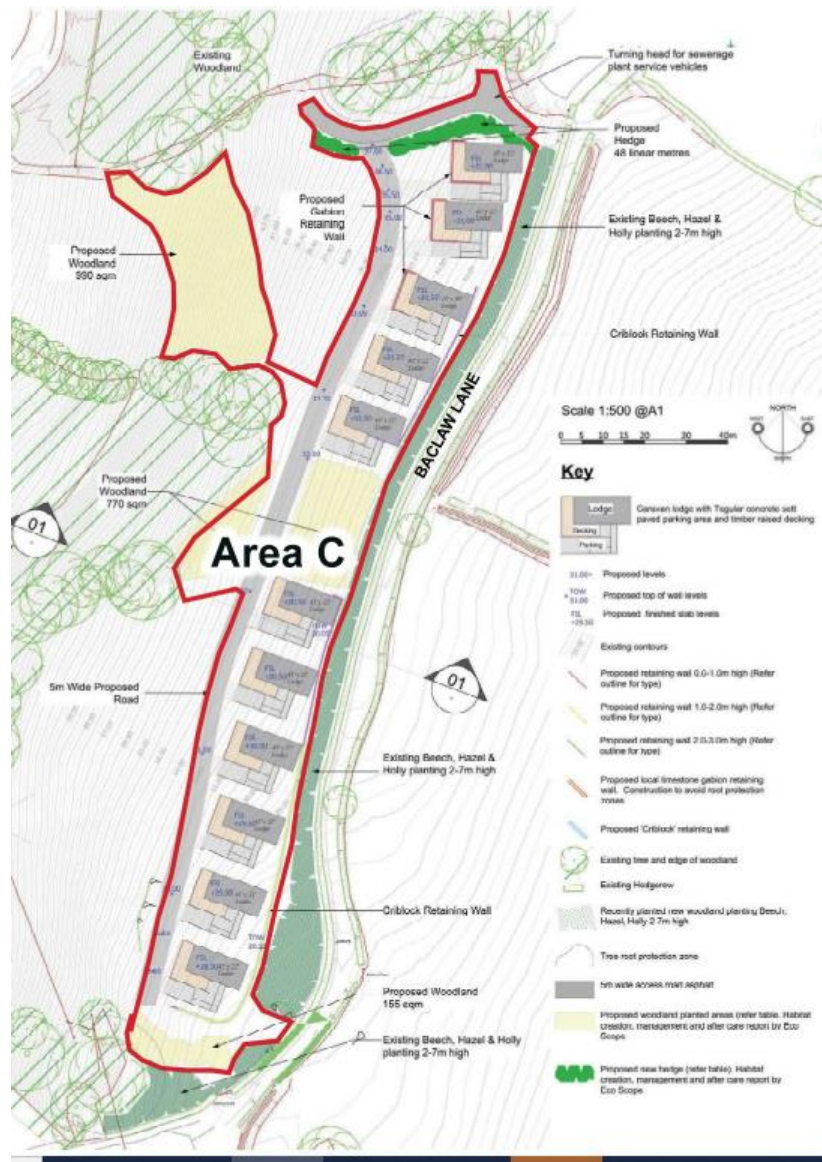
- 3.7 An overall scheme of landscape mitigation and enhancement has been prepared to help integrate the caravans within the existing landscape while providing additional enhancement planting which will also provide ecological benefit through habitat creation. Ecological corridors will be created through the linking and reinforcement of hedges, the creation of ponds and a significant increase in woodland planting. This scheme of landscape planning will be managed as part of a comprehensive ongoing landscape management plan for Gorse Hill.
- 3.8 The lodges would use the existing site's plateaus and gradient to make the terraces for the siting of units. Each plateau would contain small clusters of lodges. In the area of the existing dwellings and woodland (identified as Area A and Area B) there would one lodge replacing the northern dwelling, then a row of four lodges on the second dwelling and its garden, then two lower rows within the woodland consisting of two and four caravans respectively.
- 3.9 Existing trees will provide natural screening of the lodges. The trees will also be further enhanced with additional planting.

*Figure 3.6 Extract of proposed Site Layout Plan for the existing dwellings and woodland area.*



- 3.10 Part of the lower field, north of Baclaw Lane is proposed to provide 11 pitches on the lower area of the field cut into the lowest portion of the slope. These pitches will be screened entirely from views from Baclaw Lane and distant views to the south by a 6 metre high hedge, with 8 metre Beech trees underplanted with Hazel and Holly. The plan extract below illustrates the proposal for this part of the site, identified as Area C.

Figure 3.7 Extract of proposed Site Layout Plan for Area C north of Baclaw Lane



3.11 The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) (Environmental Associates). The LVIA considered all viewpoints through visual assessment. In addition, this was prepared alongside the photomontages and the proposed landscaping scheme has taken its brief from this to ensure that the planting will be well assimilated into the landscape.

3.12 The LVIA makes the following summary and conclusions:

- The caravan/ lodge pitches have been located to minimise potential visibility, 'nestled' behind bands of existing woodland, while also cut into the slope of the field in order to minimise views of the caravans/lodges. A scheme of landscape mitigation and enhancement has been prepared to help integrate and screen the caravans

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within the landscape. Some structural woodland planting and new hedgerow planting was implemented within the area in spring 2018. This recent planting and the proposed planting will provide additional ecological benefit through habitat creation, the linking and reinforcement of hedges, and a significant increase in woodland cover. The existing and proposed planting will be managed as part of a comprehensive ongoing landscape management plan for Gorse Hill Park.

- The colour of the caravans/ lodges is carefully chosen to tone in with the immediate environs and vegetation, as has been successfully achieved by other recent developments within the Gorse Hill Park.
- The proposed access road follows, as far as possible, the natural contours of the site, and is built without kerbs in order to enhance the rural feel of the locality. Where crossing the roots of existing, mature trees the road uses a special cellular construction to avoid compaction. Where the access road passes through the south facing field, in the first few years after construction there would be a change to the view, however, the proposed hedgerow and large block of new woodland planting immediately south of the road will soon screen any view of the road, as it matures providing ecological and landscape benefits.
- The design policy for the retaining walls needed to accommodate the road and the caravan base slabs is to avoid tall, single structures in favour of multiple, lower structures so that they will have minimal visual impact from day one, and will be more readily clothed in natural vegetation. The facing materials of these walls will be either timber cribblock type structures or natural stone-filled gabions to further lessen their visual impact.
- The proposed development works would not adversely impact any significant features of ecological, historical or cultural value and any short term effects could largely be made good through remedial works. In the longer term the proposed mitigation works would largely integrate the proposals into their setting with a potential longer term net beneficial effect, particularly when the block of proposed woodland located on the southern facing slope of the site matures, which will link two stands of existing woodland together.
- The proposed works would not detrimentally affect any scheduled ancient monument, listed building or other feature of historical note or historically significant landscape/landscape feature and is not likely to be visible to receptors in such designated landscapes.
- A baseline assessment of the receiving landscape has been undertaken which suggests that in the context of the region generally, it is pleasant, rural and largely

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unspoiled, but not scarce, not rich in features of significant quality, which suggests that it is of no more than local value and, as such, has a greater capacity to accept the proposed development than other more highly valued landscapes. A Zone of Theoretical Visibility (ZTV) has been established digitally for the proposed development and this has been further reviewed in the field. The range of possible receptors has been established and the impact on these assessed. Any significant detrimental visual effects (moderate adverse or worse) are restricted to a very limited number of receptors which have been specifically assessed and reported. Opportunities to mitigate impact have been proposed and taken into account in the assessment the visual effects in the short and longer terms. The local landscape already accommodates a significant number of caravans. Therefore, when considered in light of the mitigation proposed and the anticipated longer term landscape and ecological benefits of the scheme and the relatively restricted adverse effects on visual receptors, we consider the proposal to be an acceptable within the landscape, particularly when considered in light of the mitigation proposed, and the anticipated longer term landscape and ecological benefits of the overall scheme of planting and landscape management.

- The proposed works would not detrimentally affect a National Park/SLA or other Nationally significant landscape.

3.13 It is therefore considered that the development is acceptable in terms of landscape character and visual impact.

## Biodiversity

3.14 The accompanying ecological surveys confirm that there would be very little ecological impact by the proposed development. Overall the proposals are expected to have a minimal impact on the surrounding habitats and species when the proposed mitigation is implemented. The enhancement proposals allow the project to provide a net biodiversity gain, in compliance with local and national planning policy.

## Trees



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- 3.15 The submitted Arboricultural Assessment provides an updated and thorough assessment of the impact of the proposed development of Areas A & B and Area C in two assessments.
- 3.16 With reference to Areas A & B the Assessment confirms that no trees will be felled as part of the proposal. One hedge will be lost. Twelve trees and one group will have their RPZ impinged upon by a road. Impingement will be mitigated through the implementation of root protection measures and through the measures detailed in the Arboricultural Method Statement. Enhancement planting is shown on the landscape drawings submitted as part of the proposal and includes 1745 native species whips, 74 native species Feathered trees and a native species hedge some of which has already been planted.
- 3.17 With reference to Area C – the area to the north of Baclaw Lane the Arboricultural Assessment confirms that recent planting on site has created a substantial woodland boundary alongside the western side of Baclaw Lane. Because of the recent nature of this planting and distance from the proposed works it is not expected that the proposal will have any impact on its longevity. No pruning or lopping is anticipated to be required as part of this proposal. In time the Beech trees by Baclaw lane may require the trimming of some branches as they overhang the lodges. However, this will not be necessary for a number of years.
- 3.18 Significant woodland planting will be undertaken as part of the proposed works. The details of these measures are presented in the landscaping plans produced by Environmental Associates submitted as part of this application. The proposal includes enhancement of the hedgerow running along the eastern boundary of the site; tree planting is to occur along the length of the hedgerow resulting in the creation of a wider woodland strip (this has been created in advance of the application). Planting of new native woodland is also proposed to create a continuous woodland by connecting the woodland to the west and north-west of the application area, thereby re-connecting these woodland habitats.

## Environmental sustainability

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- 3.19 The scheme will seek to implement environmentally sustainable features where possible; this includes the use of sustainable materials, energy saving lightbulbs and other features where possible.
- 3.20 The lodges will make good use of glazing which will provide a good level of natural light as well as help heat the units.
- 3.21 The site is also accessible via public transport with bus stops available and accessible to pedestrians close to the Gorse Hill access road on Llanrwst Road. This bus route provides linkages to nearby towns and villages reducing the reliability on private vehicles for end users of the development; this will in turn contribute to reducing carbon emissions.

### **Movement to, from and within the site**

- 3.22 The internal road layout of the site has been designed to allow unrestrictive movement to, from and within the development. All routes within the Gorse Hill site are safe shared routes for pedestrians and vehicles with wide carriageways and low site speed limits. Golf buggies can also be used to take people to and from their caravans.
- 3.23 There is capacity at the existing access onto Llanrwst Road to serve this proposed development, notwithstanding the fact that a separate planning application is under consideration to improve and re-locate the access.
- 3.24 Turning and movement space will be incorporated into the design to allow a permeable internal road layout.
- 3.25 The layout will allow all users to access the site and the internal paths and circulation space will be accessible for all.

### **Character**

- 3.26 The proposed new pitches and caravan/lodge units have been designed in a way which is sympathetic of the surrounding area, having been informed by details LVIA and Arboricultural Assessment.
- 3.27 The layout, design and appearance of the scheme reflects the form of the existing site where caravan pitches are clustered in groups within enclosed woodland areas.

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- 3.28 The design, layout and scale will integrate well with the existing landscape. All areas are screened by existing trees and hedgerows. Views into the site are already obscured from most directions by the existing mature trees surrounding the site and significant additional landscaping is proposed along the more open areas of the site frontage.
- 3.29 The proposal seeks to retain existing vegetation, trees and grass verges, while implementing a landscaping scheme which adds to the existing landscaping features. Shrub, hedgerow, woodland and tree planting will be incorporated on the site to add to the rural character of the proposal.

### Community safety

- 3.30 The design of the proposal has taken into consideration the safety of the end users. It is considered the proposal will not have a detrimental impact on community safety. The design of the holiday units seeks to implement natural surveillance via orientation and thus increase safety. The proposal will enhance public safety through the cessation of the use of the existing vehicular access serving the two existing houses. The egress onto the Llanrwst Road has exceptionally poor visibility on emerging from the private road onto Llanrwst Road. The proposal re-directs the vehicular traffic through the Gorse Hill site resulting in a net improvement to highway and community safety.

### Access

- 3.31 The caravan and lodge park is served by an existing access off the B5106. The B5106 is a 40mph road, which connects Gorse Hill to Gyffin (Conwy) to the North and nearby settlement of Ty'n y Groes to the south with Dolgargog beyond this.
- 3.32 There is currently a proposal for a new improved access to serve the Gorse Hill site. It is considered that the new improved access which will provide improved visibility splays from the current 90m x 2.4m to 120m x 2.4m is acceptable in principle, and this will hopefully be delivered in due course. Despite the improvements sought to the access there is capacity on the existing access to serve the proposed development for 22 additional units without the required visibility improvements and the proposal will also deliver net highway safety enhancements by changing the access arrangements to the two existing dwellings within Area A & B which currently use an access with very poor visibility onto the B5106. This proposal would therefore remove traffic from the two existing dwellings off the extremely dangerous access that

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they are served by, which leads directly west to the B5106 Llanrwst Road from the application site.

- 3.33 The application site is located within close proximity to the A55 expressway which provides a link to the sub-regional centres of Llandudno and Bangor as well as more distant centres and cities including Wrexham and Chester.
- 3.34 There is a bus stop around 40 metres from the Gorse Hill site entrance. The application site is accessible by all means of transport including by private transport, on foot and by use of public transport. The bus stop is served by the services 19 and 77 which go from Conwy to Llanrwst, Rowen and Cwm Penmachno (which also passes through Betws y Coed). There are buses passing these stops 2-4 times an hour from first thing in the morning to early evening (08:09-23:09). This provides a choice of travel to key tourism destinations in the local area. From Llanrwst and Conwy, there are train links or further bus links available.
- 3.35 In addition, there are Public Rights of Way that border the application site, providing direct links onto the wider network of footpaths which include links down the Conwy Valley, onto Conwy Mountain, into Conwy town and into the Carneddau Snowdonia Range.
- 3.36 Whilst the application site lies within a countryside location it is also in close proximity to local attractions, in particular the historic and commercial town centre of Conwy. The caravan site owners and site management actively market local attractions to their visitors as evidenced by the Gorse Hill web page. Many of these attractions can be reached using public transport.
- 3.37 It is therefore considered that the site and the proposed development will be accessible to its future occupiers without having to rely on the private car.

## 5. Policy context

- 5.1 Relevant national planning policy guidance is set out in Planning Policy Wales (PPW) (Edition 11), 2018 and Technical Advice Notes (TAN), with local planning policy set out in the adopted Conwy Local Development Plan (2013) and relevant guidance in Supplementary Planning Guidance.

**Table 5.1 Summary of relevant planning policy and guidance**

Policy	Summary of policy
PPW Tourism	<p>PPW identifies that ‘Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.’</p> <p>The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism.</p> <p>PPW acknowledges that in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy and it should be sympathetic in nature and scale to the local environment.</p> <p>Welsh Government advises that planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity.</p> <p>Section 5.5 of PPW guides on tourism development. Paragraph 5.5.6 states that; <i>‘Planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity’</i></p> <p>This sets out a framework for high quality tourism accommodation.</p>
PPW The economy	<p>One of the key planning principles in PPW is that the planning systems should enable development which contributes to long term economic well-being. One of the themes in PPW is ‘productive and enterprising places’ and one of the key issues identified in that theme is to promote and diversity the rural economy to ensure it is fit for the future and economically sustainable while ensuring that unnecessary development in the countryside is controlled.</p> <p>Section 5.6 of PPW acknowledges that a <i>‘strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new</i></p>

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	<p><i>enterprises and the expansion of existing business is crucial to the growth and stability of rural areas’.</i></p> <p><i>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’.</i></p> <p>Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.</p> <p>This endorses the importance of tourism as a basis for the rural economy and provision for high quality tourism ventures such as the proposals at Gorse Hill Caravan Park should be considered favourably.</p> <p>Paragraph 5.9.20 of PPW advises that the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into, and given weight in the decision making process.</p> <p>When assessing sustainable benefits of development, PPW advises that there may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.</p>
<p>PPW Assessing the Sustainable Benefits of Development</p>	<p>Paragraph 2.21 advises that;  <i>“Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.”</i></p> <p>Paragraph 2.22 goes on to advise that the key factors in an assessment relate to social considerations, economic considerations, cultural considerations and environmental considerations.</p>
<p>PPW Access</p>	<p>Paragraph 3.46 states that;  <i>“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. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”</i></p> <p>Paragraph 3.6 advises that;  <i>“Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the</i></p>

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	<p><i>sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.”</i></p>
PPW Amenity	<p>Paragraph 3.21 states that;  <i>“The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity.”</i></p>
PPW Design	<p>Section 3 relates to design and Placemaking In Action. It considers that Good Design Making Better Places. Paragraph 3.3 advises that;  <i>“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area.”</i></p> <p>Paragraph 3.4 goes on to state that;  <i>“Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future. For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales. These objectives can be categorised into five key aspects of good design”.</i></p>
PPW Biodiversity	<p>In terms of biodiversity, paragraph 6.4.1 of PPW advises that biodiversity underpins the structure and functioning of ecosystems. Paragraph 6.4.3 goes on to advise that the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Proposals should support the conservation of biodiversity, in particular the conservation of wildlife and habitats.</p> <p>The proposed development has been informed by a Preliminary Ecological Assessment which includes details of proposed biodiversity enhancement measures ensuring that the scheme has taken account of biodiversity interest as part of the design process.</p>
TAN 6 Planning for Sustainable Rural Communities	<p>TAN 6 gives advice on sustainable forms of development within rural Wales and paragraph 2.1.1 states:  <i>‘The planning system has a key role to play in supporting the delivery of sustainable rural communities. It can help to ensure that appropriate development takes place in the right place at the right time by making sufficient</i></p>

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	<p><i>land available to provide homes and employment opportunities for local people, helping to sustain rural services.'</i></p> <p>Paragraph 3.1.1 of TAN 6 advises that: <i>'Strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural environments and landscapes'.</i></p> <p>The advice note then goes on to say 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.</p>
TAN 12 Design	<p>The guidance in TAN 12 has been considered in formulating the proposal and in reporting on the Design and Access issues. The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales. Paragraph 5.5.1 of TAN 12 identifies that an understanding of landscape and townscape quality, including its historic character, is fundamental to the design process.</p> <p>The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.</p> <p>Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.</p>
TAN 13 Tourism	<p>TAN provides guidance on tourism related issues in planning including matters relating to hotel development, holiday and touring caravans and seasonal and holiday occupancy conditions.</p> <p>The TAN recognises that holiday accommodation development can bring benefits for the local community to support amenities and activities for residents and tourists.</p> <p>Paragraph 4 identifies that tourism makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season.</p> <p>Technical Advice Note 13 supplements Planning Policy Wales and provides guidance on tourism development. Paragraph 4 identifies that Tourism makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and</p>



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	<p>communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season.</p> <p>TAN 13 advises that; <i>'In preparing development plans, local planning authorities should investigate the adequacy of facilities for both the static and touring caravanser and reconcile these needs with the protection of the environment. Holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation, while using less land for the purpose. Holiday caravan sites can be intrusive in the landscape, particularly on the coast. Special consideration needs to be given to proposals for new sites, especially in National Parks, Areas of Outstanding Natural Beauty, Heritage Coast and sites of national and international importance designated for their natural features'</i>.</p> <p>Tourism facilities should be provided in both rural and urban areas and should be sensitive to the needs of users, attractive, well designed, well maintained, protected from crime and vandalism, safe and accessible by people whose mobility is restricted and by a variety of sustainable means of travel, particularly walking, cycling and public transport.</p>
TAN 18 Transport	<p>TAN 18 has also been taken into consideration. The main aim of TAN 18 is ensuring that new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.</p> <p>Paragraph 2.4 of TAN identifies that the inter-relationship between land use planning and transport is complex and varied. The development of land is dependant, in part, upon transport infrastructure and services to function efficiently. By influencing the location, scale, density and mix of land uses and new development, land use planning can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.</p> <p>TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, in particular ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p>
TAN 23 Economic Development	<p>Technical Advice Note 23 'Economic Development' (February 2014) sets out advice on economic development considerations of developments. Section 3 of the Note discusses 'Economic Development and the Rural Economy'. Paragraph 3.1.1 states that; 'A wide range of economic activities may be sustainably accommodated in rural areas, and this is recognised in PPW and other TANs, in particular TAN 6 Planning for Sustainable Rural Communities.'</p> <p>TAN 23 reiterates the importance of economic development and the rural economy, stating that 'Sustainable development is essential to building strong rural economies and vibrant communities.'</p> <p>TAN 23 goes on to state that in rural areas local planning authorities should use a sequential approach when identifying land for economic uses in development plans. Less preferable locations may also be appropriate where the resulting benefits outweigh any adverse impacts of the development. In judging these</p>

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	<p>benefits, authorities should have regard to considerations such as jobs accommodated, alternatives, and special merit.</p> <p>As the proposal in this case is for a modest extension to the existing tourism business at Gorse Hill Caravan and Lodge Park, it follows that the site for the proposal must be in the rural location where the existing business is already established. The business should be supported in expanding, and this proposal can help to secure improvements to the business but also help mitigate existing visual impact caused by the site whilst improving the quality of the tourism offer.</p> <p>Finally, the guidance makes it clear that the expansion of existing businesses located in the open countryside should be supported provided there are no unacceptable impacts on local amenity. This submission demonstrates that there are no unacceptable impacts on local amenity arising from the proposal for a modest extension to the existing caravan park.</p>
<p>TAN 24 The Historic Environment 2017</p>	<p>TAN 24 provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning. The TAN provides guidance on how the following aspects of the historic environment should be considered:</p> <ul style="list-style-type: none"> <li>• World Heritage Sites</li> <li>• scheduled monuments</li> <li>• archaeological remains</li> <li>• listed buildings</li> <li>• conservation areas</li> <li>• historic parks and gardens</li> <li>• historic landscapes</li> <li>• historic assets of special local interest.</li> </ul>

### Conwy Local Development Plan

<p>CLDP Policy TOU/1 Sustainable Tourism</p>	<p>Policy TOU/1 supports in principle, proposals for new high quality all-year round sustainable tourism development that diversifies the economy and encourages cross-boundary links with neighbouring authorities,</p> <p><i>'The Council will promote a sustainable tourism economy by:</i></p> <p><i>a) Supporting, in principle, proposals for new high quality all-year round sustainable tourism development that diversifies the economy and encourages cross-boundary links with neighbouring authorities, in line with Policy TOU/2 – 'New Sustainable Tourism and Recreational Development';</i></p> <p><i>b) Resisting proposals that would result in the loss of serviced accommodation, in line with Policy TOU/3 – 'Holiday Accommodation Zone';</i></p> <p><i>c) Control the development of both new sites and extensions to existing sites for chalets, static and touring caravans and camping within the Plan Area, in line with Policy TOU/4 – 'Chalet, Caravan and Camping Sites;</i></p> <p><i>d) Support, in principle, proposals to extend the holiday season in off-peak periods for existing chalets, static and touring caravans and camping sites whilst sustaining environmental and heritage qualities as set out in Policy TOU/4;</i></p> <p><i>e) Improve connectivity by supporting the delivery of improved links at Foryd Harbour, improvements to the Wales Coastal Path and through the Public Rights of Way Improvement Plan in line with Strategic Policy STR/1 – 'Sustainable Transport, Development and Accessibility' and Policy TOU/2;</i></p>
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	<p><i>f) Support, in principle, the establishment of new or converted high quality (4 and 5*) hotels which broaden the range of accommodation available in line with Policy TOU/2.'</i></p>
<p>CLDP TOU2 New Sustainable Tourism and recreational development</p>	<p>New high quality sustainable tourism and recreational development within the Urban and Rural Development Strategy Areas will only be supported provided the policy criteria are met.</p> <p>The criteria promotes all year-round high quality tourism offer which provides a range of tourism facilities and leisure activities; proposals appropriate in scale and nature to its location and demonstrates resource efficient design; evidence to demonstrate that there would be local employment benefits in terms of the number and range of jobs; sustainably accessible and encourages the use of non-car based transport; the proposal makes use of previously developed land in preference to greenfield sites (where appropriate); the proposal would not have an unacceptable adverse impact on occupiers of neighbouring properties; the proposal would support and extend the range of facilities on offer within the County; the proposal would assist the Council's regeneration objectives of Conwy; the proposal meets other related policies in the Plan; the proposal would not appear obtrusive in the landscape and is accompanied by a detailed landscaping scheme.</p> <p>New high-quality holiday accommodation will only be supported where it forms an ancillary or complementary part of an existing or proposed new tourism development scheme.</p>
<p>CLDP Policy TOU/4 Development of caravan and camping sites</p>	<p>The most relevant LDP policy is TOU4</p> <p><i>'1. There will be a presumption against the development of new static caravan sites. Proposals for the improvement of existing sites within the Urban Development Strategy Area will only be permitted provided that the development:</i></p> <p><i>a) Does not increase the number of static caravan or chalet units on the site, although minor extensions to the area of a site to facilitate density reduction and environmental or amenity improvements may be permitted;</i></p> <p><i>b) Promotes a higher quality holiday accommodation, facility and design;</i></p> <p><i>c) Would not appear visually obtrusive in the landscape and is accompanied by a detailed landscaping scheme and, where appropriate, a Landscape and Visual Impact Assessment;</i></p> <p><i>d) Accords with the Development Principles and other related policies within the Plan including the joint protocol on flood risk for Towyn and Kinmel Bay;</i></p> <p><i>e) Is accompanied by a Biodiversity Statement which indicates where biodiversity gains will be achieved in line with Policy NTE/3.</i></p> <p><i>2. Extensions or improvements to existing chalet, caravan and camping sites within the Rural Development Strategy Area will only be permitted providing that the development conforms to all of the following criteria:</i></p> <p><i>a) The site is within or adjacent to, and would form part of, an existing chalet, caravan and camping site;</i></p> <p><i>b) Any increase in the number of pitches or accommodation units proposed over the Plan Period is small in scale, relative to the scale and extent of existing provision within the same chalet, caravan or camping site;</i></p> <p><i>c) The scheme would not result in an unacceptable concentration of sites or pitches at any one locality or area;</i></p> <p><i>d) Suitable access can be achieved and the development does not result in an unacceptable risk to highway safety;</i></p> <p><i>e) Compliance with criteria 1. b) – e) above.'</i></p>

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<p>DP/1 outlines the CLDP's Sustainable Development</p>	<p><i>1. Development will only be permitted where it is demonstrated that it is consistent with the principles of sustainable development. All developments are required to:</i></p> <ul style="list-style-type: none"> <li><i>a. Accord with national guidance in line with Policy DP/6 – ‘National Guidance’;</i></li> <li><i>b. Be consistent with the sequential approach to development as set out in Spatial Policy DP/2 – ‘Overarching Strategic Approach’;</i></li> <li><i>c. Make efficient and effective use of land, buildings and infrastructure by giving priority to the use of previously developed land in accessible locations, achieve compact forms of development through the use of higher densities and be capable of future adaptation in line with Policy DP/2 and other related policies within the Plan;</i></li> <li><i>d. Conserve or enhance the quality of buildings, sites and places of historic, archaeological or architectural importance in line with Strategic Policy CTH/1 – ‘Cultural Heritage’;</i></li> <li><i>e. Conserve or enhance the quality of biodiversity and wildlife habitats, and safeguard protected species in line with Strategic Policy NTE/1 – ‘The Natural Environment’;</i></li> <li><i>f. Take account of and address the risk of flooding and pollution in the form of noise, lighting, vibration, odour, emissions or dust in line with Policies DP/2 and DP/3 – ‘Promoting Design Quality and Reducing Crime’;</i></li> <li><i>g. Make efficient and effective use of resources by employing sustainable building techniques, incorporating energy and water conservation measures and, wherever possible, the use of renewable energy, in line with Policy DP/3 and Strategic Policy NTE/1;</i></li> </ul> <p><i>2. Development proposals should also where appropriate:</i></p> <ul style="list-style-type: none"> <li><i>a. Provide safe and convenient access by public transport, bicycle and on foot minimising the need to travel by car in line with Policy DP/2 and Strategic Policy STR/1 – ‘Sustainable Transport, Development and Accessibility’;</i></li> <li><i>b. Include measures to manage traffic and minimise congestion arising in line with Strategic Policy STR/1;</i></li> <li><i>c. Make provision for infrastructure and other public services made necessary by the development, in line with Policies DP/4 – ‘Development Criteria’, DP/5 – ‘Infrastructure and New Developments’ and the Monitoring and Implementation Plan;</i></li> <li><i>d. Be designed to a high standard, being attractive, adaptable, accessible, safe and secure as set out in Policy DP/3;</i></li> <li><i>e. Promote sustainable economic development in line with Strategic Policy EMP/1 – ‘Meeting the Employment Need’;</i></li> <li><i>f. Conserve or enhance the quality of valued open spaces, the character and quality of local landscapes and the wider countryside in line with Strategic Policies NTE/1 and CFS/1 – ‘Community Facilities and Services’;</i></li> <li><i>g. Take account and address the potential impact of climate change in line with Strategic Policy NTE/1;</i></li> <li><i>h. Protect the quality of natural resources including water, air and soil in line with Strategic Policy NTE1;</i></li> <li><i>i. Reduce waste production and manage waste re-cycling in line with Strategic Policy MWS/1 – ‘Minerals and Waste’.</i></li> </ul>
<p>CLDP Policy DP/3 Promoting Design Quality and Reducing Crime</p>	<p><i>‘1. All new development will be of high quality, sustainable design which provides usable, safe, durable and adaptable places, and protects local character and distinctiveness of the Plan Area’s built historic and natural environment. The Council will require development to:</i></p>

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	<p>a) Be appropriate to, and enhance, its locality in terms of form, scale, massing, elevation detail and use of materials;</p> <p>b) Meet the Council's approved standards of open space provision and parking, while providing for all ages, accessibility needs, and people with disabilities;</p> <p>c) Have regard to the impact on adjacent properties and areas and habitats supporting protected species;</p> <p>d) Have regard to appropriate orientation, energy efficiency and the use of renewable energy in design, layout, materials and technology in accordance with NTE/7 – 'Energy Efficiency and Renewable Technologies in Development';</p> <p>e) Provide sustainable urban drainage systems to limit waste water and water pollution and reduce flood risk in line with national guidance and Policy NTE/9 – 'Sustainable Drainage Systems'.</p> <p>2. The Council will also seek, where appropriate, to:</p> <p>a) Enhance the local character of buildings, heritage and open spaces;</p> <p>b) Provide for a compatible mix of uses, particularly in town and village centres;</p> <p>c) Incorporate landscaping within and around the development appropriate to the scale and impact of the development;</p> <p>d) Integrate with existing routes to provide linked up places connecting with the wider area, in particular public facilities and green transport routes;</p> <p>e) Provide developments that offer transport alternatives and promote walking, cycling and use of public transport;</p> <p>f) Create safe places through the adoption of 'designing-out-crime' principles to provide natural surveillance, visibility, and well lit environments and areas of public movement;</p> <p>g) Secure the retention and enhancement of features of biodiversity;</p> <p>h) Incorporate areas and facilities for waste management, rainwater harvesting/storage, grey water reuse and recycling;</p> <p>i) Have regard to the Authority's Road Adoption Guidelines in road design.</p> <p>3. The Council will seek the contribution of an agreed percentage of the total development costs for the provision or commissioning of publicly accessible art or design improvement works in accordance with DP/5 'Infrastructure and New Developments' and the Planning Obligations SPG where appropriate to its location and viability.'</p>
<p>CLDP Policy DP/4 Development Criteria;</p>	<p>'1. Development proposals, where appropriate and in accordance with the policies of the Plan and the Council's Standards and Supplementary Planning Guidance, should provide the following:</p> <p>a) Affordable Housing for Local Need;</p> <p>b) Safe access from the highway network and enhancement of public transport, cycling and pedestrian infrastructure;</p> <p>c) Car parking;</p> <p>d) Safe and secure cycle parking;</p> <p>e) Open Space;</p> <p>f) Safe and convenient access for all to public buildings and spaces, including those with limited mobility or those with other impairments such as of sight or hearing;</p> <p>g) Screened storage of refuse, including recyclable materials;</p> <p>h) A design and layout that minimises opportunities for crime;</p> <p>i) Financial contributions towards the provision and maintenance of infrastructure, services and facilities required by the development.'</p>

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<p>NTE/4 Special Landscape Areas</p>	<p><i>'In order to conserve the attributes of the Special Landscape Areas development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape. In appropriate cases planning applications should be accompanied by a Landscape and Visual Impact Assessment to assess the visual and landscape impacts of the development.'</i></p> <p>In this case, the proposals are well screened due to existing topography and by existing trees and hedges. In addition, the landscaping proposals enhance this part of the site. Therefore, the proposed development can be accommodated and integrated successfully into the landscape without having an adverse visual impact on the views towards application site.</p>
<p>CLDP Policy NTE/1 The Natural Environment</p>	<p><i>'In seeking to support the wider economic and social needs of the Plan Area, the Council will seek to regulate development so as to conserve and, where possible, enhance the Plan Area's natural environment, countryside and coastline. This will be achieved by:</i></p> <p><i>a) Safeguarding the Plan Area's biodiversity, geology, habitats, history and landscapes through the protection and enhancement of sites of international, national, regional and local importance, in line with Policy DP/6 – National Planning Policy and Guidance';</i></p> <p><i>b) Using Green Wedges and settlement boundaries to control the identity of individual settlements, to prevent coalescence and to protect the immediate landscape surrounding urban areas in line with Policy NTE/2 – 'Green Wedges and Meeting the Development Needs of the Community';</i></p> <p><i>c) Where appropriate and necessary, improving the quality of statutory and non-statutory landscapes and areas of biodiversity value affected by development, through management agreements, habitat connectivity, improved planting, landscape and maintenance specifications, in line with the Development Principle Policies and Policy NTE/3 – 'Biodiversity';</i></p> <p><i>d) Working with developers to safeguard protected species and enhance their habitats in line with Policies DP/6 and NTE/3;</i></p> <p><i>e) Seeking to minimise the loss of Grade 2 and 3a agricultural land to new development, in particular, in the east of the Urban Development Strategy Area, in line with Policy DP/6;</i></p> <p><i>f) Respecting, retaining or enhancing the local character and distinctiveness of the individual Special Landscape Areas in line with Policy NTE/4 – 'The Landscape and Protecting Special Landscape Areas' and as shown on the Proposals Map;</i></p> <p><i>g) Protecting the Coastal Zone in line with Policy NTE/5 – 'The Coastal Zone';</i></p> <p><i>h) Promoting energy efficiency and renewable technologies in development in line with Policy NTE/6 – 'Energy Efficiency and Renewable Technologies in New Development';</i></p> <p><i>i) Preventing, reducing or remedying all forms of pollution including air, light, noise, soil and water, in line with Policy DP/6'</i></p>
<p>CLDP Policy NTE/3 Biodiversity.</p>	<p><i>'1. New development should aim to conserve and, where possible, enhance biodiversity through:</i></p> <p><i>a) Sensitive siting; avoiding European protected sites or those of national or local importance;</i></p> <p><i>b) Sensitive layout and design which avoids impacts or mitigates through an agreed programme for any identified adverse impact on biodiversity;</i></p>

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	<p>c) <i>Creating, enhancing and managing wildlife habitats and natural landscapes including connectivity;</i></p> <p>d) <i>Integrating biodiversity measures into the built environment;</i></p> <p>e) <i>Contributing to achieving targets in the Conwy Local Biodiversity Action Plan (LBAP);</i></p> <p>f) <i>Providing for a management agreement with the Local Planning Authority to secure the retention and long term future of biodiversity interests where applicable.</i></p> <p>2. <i>All proposals should include a Biodiversity Statement detailing the extent of impact on biodiversity.</i></p> <p>3. <i>The Council will refuse proposals which would have a negative impact on a European Site, protected or priority species or habitat unless the impact is adequately mitigated and appropriate remediation and enhancement measures are proposed and secured by planning conditions or obligations.'</i></p>
Policy NTE/4 – The Landscape And Protecting Special Landscape Areas	<p>The application site is located within the Special Landscape Area [Conwy Valley].</p> <p>2. In order to conserve the attributes of the Special Landscape Areas development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape. In appropriate cases planning applications should be accompanied by a Landscape and Visual Impact Assessment to assess the visual and landscape impacts of the development.</p> <p>3. All proposals, both within and outside SLAs, will be considered against the Development Principles and other policies in the Plan designed to protect the environment and landscape character.</p> <p>The application is supported by a Landscape and Visual Impact Assessment which considers the impact of the development on the character and landscape.</p>
CLDP Policy STR/2 Parking Standards and SPG LDP 02 Parking Standard	<p>Policy STR/2 guides that car parking provision should be in accordance with the Council's maximum standards, to reduce dependency on the car and to promote more sustainable forms of transport.</p> <p>There are no specific parking standards for static caravan use.</p>

## Design

5.2 The following section of the statement identifies the national and local planning policy guidance that has been taken into consideration with regards to design policies which have been taken account of in designing the proposals.

**Table 5.2: Summary of relevant design policies**

Policy	Summary of policy
PPW Chapter 4 Planning for Sustainability	The planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker.

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	<p>It is identified in paragraph 4.11.1 of PPW that; <i>'Design is taken to mean the relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics, and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings'.</i></p> <p>Paragraph 4.11.4 goes on to identify that; <i>'Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone'.</i></p>
TAN 12 Design	<p>The guidance in TAN 12 has been considered in formulating the proposal and in reporting on the Design and Access issues. The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales. Paragraph 5.5.1 of TAN 12 identifies that an understanding of landscape and townscape quality, including its historic character, is fundamental to the design process.</p> <p>The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.</p> <p>Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.</p>

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DP/1 outlines the CLDP's Sustainable Development	<p><i>1. Development will only be permitted where it is demonstrated that it is consistent with the principles of sustainable development. All developments are required to:</i></p> <ul style="list-style-type: none"> <li><i>a. Accord with national guidance in line with Policy DP/6 – 'National Guidance';</i></li> <li><i>b. Be consistent with the sequential approach to development as set out in Spatial Policy DP/2 – 'Overarching Strategic Approach';</i></li> <li><i>c. Make efficient and effective use of land, buildings and infrastructure by giving priority to the use of previously developed land in accessible locations, achieve compact forms of development through the use of higher densities and be capable of future adaptation in line with Policy DP/2 and other related policies within the Plan;</i></li> <li><i>d. Conserve or enhance the quality of buildings, sites and places of historic, archaeological or architectural importance in line with Strategic Policy CTH/1 – 'Cultural Heritage';</i></li> <li><i>e. Conserve or enhance the quality of biodiversity and wildlife habitats, and safeguard protected species in line with Strategic Policy NTE/1 – 'The Natural Environment';</i></li> </ul>
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	<p><i>f. Take account of and address the risk of flooding and pollution in the form of noise, lighting, vibration, odour, emissions or dust in line with Policies DP/2 and DP/3 – ‘Promoting Design Quality and Reducing Crime’;</i></p> <p><i>g. Make efficient and effective use of resources by employing sustainable building techniques, incorporating energy and water conservation measures and, wherever possible, the use of renewable energy, in line with Policy DP/3 and Strategic Policy NTE/1;</i></p> <p><i>2. Development proposals should also where appropriate:</i></p> <p><i>a. Provide safe and convenient access by public transport, bicycle and on foot minimising the need to travel by car in line with Policy DP/2 and Strategic Policy STR/1 – ‘Sustainable Transport, Development and Accessibility’;</i></p> <p><i>b. Include measures to manage traffic and minimise congestion arising in line with Strategic Policy STR/1;</i></p> <p><i>c. Make provision for infrastructure and other public services made necessary by the development, in line with Policies DP/4 – ‘Development Criteria’, DP/5 – ‘Infrastructure and New Developments’ and the Monitoring and Implementation Plan;</i></p> <p><i>d. Be designed to a high standard, being attractive, adaptable, accessible, safe and secure as set out in Policy DP/3;</i></p> <p><i>e. Promote sustainable economic development in line with Strategic Policy EMP/1 – ‘Meeting the Employment Need’;</i></p> <p><i>f. Conserve or enhance the quality of valued open spaces, the character and quality of local landscapes and the wider countryside in line with Strategic Policies NTE/1 and CFS/1 – ‘Community Facilities and Services’;</i></p> <p><i>g. Take account and address the potential impact of climate change in line with Strategic Policy NTE/1;</i></p> <p><i>h. Protect the quality of natural resources including water, air and soil in line with Strategic Policy NTE1;</i></p> <p><i>i. Reduce waste production and manage waste re-cycling in line with Strategic Policy MWS/1 – ‘Minerals and Waste’.</i></p>
<p>CLDP Policy DP/3 Promoting Design Quality and Reducing Crime</p>	<p><i>‘1. All new development will be of high quality, sustainable design which provides usable, safe, durable and adaptable places, and protects local character and distinctiveness of the Plan Area’s built historic and natural environment. The Council will require development to:</i></p> <p><i>a) Be appropriate to, and enhance, its locality in terms of form, scale, massing, elevation detail and use of materials;</i></p> <p><i>b) Meet the Council’s approved standards of open space provision and parking, while providing for all ages, accessibility needs, and people with disabilities;</i></p> <p><i>c) Have regard to the impact on adjacent properties and areas and habitats supporting protected species;</i></p> <p><i>d) Have regard to appropriate orientation, energy efficiency and the use of renewable energy in design, layout, materials and technology in accordance with NTE/7 – ‘Energy Efficiency and Renewable Technologies in Development’;</i></p> <p><i>e) Provide sustainable urban drainage systems to limit waste water and water pollution and reduce flood risk in line with national guidance and Policy NTE/9 – ‘Sustainable Drainage Systems’.</i></p> <p><i>2. The Council will also seek, where appropriate, to:</i></p> <p><i>a) Enhance the local character of buildings, heritage and open spaces;</i></p> <p><i>b) Provide for a compatible mix of uses, particularly in town and village centres;</i></p> <p><i>c) Incorporate landscaping within and around the development appropriate to the scale and impact of the development;</i></p>

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	<p>d) Integrate with existing routes to provide linked up places connecting with the wider area, in particular public facilities and green transport routes;</p> <p>e) Provide developments that offer transport alternatives and promote walking, cycling and use of public transport;</p> <p>f) Create safe places through the adoption of ‘designing-out-crime’ principles to provide natural surveillance, visibility, and well lit environments and areas of public movement;</p> <p>g) Secure the retention and enhancement of features of biodiversity;</p> <p>h) Incorporate areas and facilities for waste management, rainwater harvesting/storage, grey water reuse and recycling;</p> <p>i) Have regard to the Authority’s Road Adoption Guidelines in road design.</p> <p>3. The Council will seek the contribution of an agreed percentage of the total development costs for the provision or commissioning of publicly accessible art or design improvement works in accordance with DP/5 ‘Infrastructure and New Developments’ and the Planning Obligations SPG where appropriate to its location and viability.’</p>
<p>CLDP Policy DP/4 Development Criteria;</p>	<p>‘1. Development proposals, where appropriate and in accordance with the policies of the Plan and the Council’s Standards and Supplementary Planning Guidance, should provide the following:</p> <p>a) Affordable Housing for Local Need;</p> <p>b) Safe access from the highway network and enhancement of public transport, cycling and pedestrian infrastructure;</p> <p>c) Car parking;</p> <p>d) Safe and secure cycle parking;</p> <p>e) Open Space;</p> <p>f) Safe and convenient access for all to public buildings and spaces, including those with limited mobility or those with other impairments such as of sight or hearing;</p> <p>g) Screened storage of refuse, including recyclable materials;</p> <p>h) A design and layout that minimises opportunities for crime;</p> <p>i) Financial contributions towards the provision and maintenance of infrastructure, services and facilities required by the development.’</p>
<p>NTE/4 Special Landscape Areas</p>	<p>‘In order to conserve the attributes of the Special Landscape Areas development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape. In appropriate cases planning applications should be accompanied by a Landscape and Visual Impact Assessment to assess the visual and landscape impacts of the development.’</p> <p>In this case, the proposals are well screened due to existing topography and by existing trees and hedges. In addition, the landscaping proposals enhance this part of the site. Therefore, the proposed development can be accommodated and integrated successfully into the landscape without having an adverse visual impact on the views towards application site.</p>
<p>CLDP Policy NTE/1 The Natural Environment</p>	<p>‘In seeking to support the wider economic and social needs of the Plan Area, the Council will seek to regulate development so as to conserve and, where possible, enhance the Plan Area’s natural environment, countryside and coastline. This will be achieved by:</p> <p>a) Safeguarding the Plan Area’s biodiversity, geology, habitats, history and landscapes through the protection and enhancement of sites of international,</p>

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	<p><i>national, regional and local importance, in line with Policy DP/6 – National Planning Policy and Guidance’;</i></p> <p><i>b) Using Green Wedges and settlement boundaries to control the identity of individual settlements, to prevent coalescence and to protect the immediate landscape surrounding urban areas in line with Policy NTE/2 – ‘Green Wedges and Meeting the Development Needs of the Community’;</i></p> <p><i>c) Where appropriate and necessary, improving the quality of statutory and non-statutory landscapes and areas of biodiversity value affected by development, through management agreements, habitat connectivity, improved planting, landscape and maintenance specifications, in line with the Development Principle Policies and Policy NTE/3 – ‘Biodiversity’;</i></p> <p><i>d) Working with developers to safeguard protected species and enhance their habitats in line with Policies DP/6 and NTE/3;</i></p> <p><i>e) Seeking to minimise the loss of Grade 2 and 3a agricultural land to new development, in particular, in the east of the Urban Development Strategy Area, in line with Policy DP/6;</i></p> <p><i>f) Respecting, retaining or enhancing the local character and distinctiveness of the individual Special Landscape Areas in line with Policy NTE/4 – ‘The Landscape and Protecting Special Landscape Areas’ and as shown on the Proposals Map;</i></p> <p><i>g) Protecting the Coastal Zone in line with Policy NTE/5 – ‘The Coastal Zone’;</i></p> <p><i>h) Promoting energy efficiency and renewable technologies in development in line with Policy NTE/6 – ‘Energy Efficiency and Renewable Technologies in New Development’;</i></p> <p><i>i) Preventing, reducing or remedying all forms of pollution including air, light, noise, soil and water, in line with Policy DP/6’</i></p>
<p>CLDP Policy NTE/3 Biodiversity.</p>	<p><i>‘1. New development should aim to conserve and, where possible, enhance biodiversity through:</i></p> <p><i>a) Sensitive siting; avoiding European protected sites or those of national or local importance;</i></p> <p><i>b) Sensitive layout and design which avoids impacts or mitigates through an agreed programme for any identified adverse impact on biodiversity;</i></p> <p><i>c) Creating, enhancing and managing wildlife habitats and natural landscapes including connectivity;</i></p> <p><i>d) Integrating biodiversity measures into the built environment;</i></p> <p><i>e) Contributing to achieving targets in the Conwy Local Biodiversity Action Plan (LBAP);</i></p> <p><i>f) Providing for a management agreement with the Local Planning Authority to secure the retention and long term future of biodiversity interests where applicable.</i></p> <p><i>2. All proposals should include a Biodiversity Statement detailing the extent of impact on biodiversity.</i></p> <p><i>3. The Council will refuse proposals which would have a negative impact on a European Site, protected or priority species or habitat unless the impact is adequately mitigated and appropriate remediation and enhancement measures are proposed and secured by planning conditions or obligations.’</i></p>
<p>CLDP Policy STR/2 Parking Standards and SPG LDP 02 Parking Standard</p>	<p>Policy STR/2 guides that car parking provision should be in accordance with the Council’s maximum standards, to reduce dependency on the car and to promote more sustainable forms of transport.</p> <p>There are no specific parking standards for static caravan use.</p>

## Accessibility

- 5.3 The following section of the statement identifies the national and local planning policy guidance that has been taken into consideration with regards to the means of access to and from the proposed development.
- 5.4 The Active Travel (Wales) Act 2013 focuses on walking and cycling as a mode of transport and highlights the importance of planning and building walking and cycling infrastructure as well as encouraging behaviour change in Wales.

**Table 5.3: Policy relating to access**

Policy	Summary of policy
PPW	PPW advises that all Local Authorities should consider the issue of accessibility for all, including the needs of those with visual and hearing impairments and those with limited mobility such as wheelchair users, elderly people and people with young children.
TAN 18 Transport	<p>TAN 18: Transport has also been taken into consideration. The main aim of TAN 18 is ensuring that new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.</p> <p>Paragraph 2.4 of TAN identifies that the inter-relationship between land use planning and transport is complex and varied. The development of land is dependant, in part, upon transport infrastructure and services to function efficiently. By influencing the location, scale, density and mix of land uses and new development, land use planning can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.</p> <p>TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, in particular ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p>
<b>Conwy Local Development Plan</b>	
CLDP policy STR/1 sustainable transport, development and accessibility.	<p>This policy sets out criteria (a-d) with criteria 'a' relevant to this proposal which states;</p> <p><i>'Development will be located so as to minimise the need to travel. Convenient access via footways, cycle infrastructure and public transport should exist or be provided where appropriate, thereby encouraging the use of these modes of travel for local journeys and reducing the need to travel by private car and improving the accessibility of services to those with poor availability of transport. The Council will endeavour to improve accessibility and seek to change travel behaviour. This will be achieved by working with our partners to:</i></p>

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	<p>a) Focus future development in the County Borough in highly accessible locations, predominantly along the A55 and railway network within and on the edge of the Urban Development Strategy Area within the coastal belt in line with Policy DP/2 'Overarching Strategic Approach'. All development proposals will be assessed against the Council's Parking Standards as set out in Policy STR/2 – 'Parking Standards SPG', mitigate travel in line with Policy STR/3 – 'Mitigating Travel Impact' and promote sustainable modes in line with Policy STR/4 – 'Non-Motorised Travel'</p>
<p>CLDP Policy STR/2 relates to Parking Standards and states that;</p>	<p>'1. Car parking provision should be in accordance with the Council's maximum standards, to reduce dependency on the car and to promote more sustainable forms of transport. 2. In locations with good accessibility to facilities and services, and served by high quality public transport, the Council will seek to reduce the amount of car parking provided, in line with the Conwy Parking Standards. 3. Secure cycle storage should be provided in accordance with the Council's standards.'</p>
<p>CLDP Policy STR/4 non-motorised travel</p>	<p>'The Council will support increased levels of non-motorised travel, including cycle use and walking, by ensuring that travel generating developments are located and designed to facilitate and encourage short distance trips between home, work, schools and colleges, other suitable destinations and for leisure. Apart from minimising the distance between trip origins and destinations, development proposals should ensure: a) That adequate safe and secure cycle parking is provided in accordance with the standards in Policy STR/2; b) That detailed designs and layouts encourage cycle use and walking.'</p>

## 6. Main considerations

### Principle of development

- 6.1 Policy TOU/4 permits extensions or improvements to existing chalet and caravan sites within an area defined in the Conwy Local Development Plan as the Rural Development Strategy Area provided that the proposals comply with the policies criteria 2.a – 2.e and 1.b - 1.e.
- 6.2 In line with criterion 2.a; the application site is on land directly adjoining the existing site and would form part of the existing Gorse Hill Caravan and Lodge Park. There are currently 270 luxury static caravans / lodges on the Gorse Hill site. The proposal allows for a modest increase 22 caravans to the entire site which is an 8% increase over the existing caravans at Gorse Hill.
- 6.3 In accordance with criterion 2.b, the increase in the number of units by 22 additional static caravans/ lodges at Gorse Hill is small in scale, relative to the scale and extent of existing provision within the site. The policy part 2b stipulates that this relates to units proposed over the Plan Period. Since the LDP was adopted in 2013, the only additional units which have been approved are summarised below:
- DC/0/41434 Approved 06/05/2015 – Siting of 2 static caravans;
  - APP/T6905/A/15/3007265 Allowed 07/10/2015 – Siting of 14 static caravans.
- 6.4 The baseline number of units (at the adoption of the LDP would therefore have been 255 units on site. However, a Section 73 application, which has been implemented, reduced the number of units on an earlier consent on the site by 3 (under planning approval DC/0/42485). This makes the overall increase in numbers during the Plan period 13 rather than 16. Therefore, the overall net increase including the new units would be 24 additional units, which equates to 9.4%. This is considered a small-scale increase to the park overall. It is therefore considered that this increase is acceptable in line with the Policy TOU 4 criterion 2.b.
- 6.5 In line with criterion 2.c, it is not considered that the scheme would result in an unacceptable concentration of sites or pitches in one locality as there is demand for the units and there is capacity on the site to facilitate the units. The Gorse Hill caravan site and its neighbour the Conwy Touring Park are well established holiday sites on the fringe of Conwy. Whilst they are relatively large sites, they are not in an area where there is an over concentration of pitches in one particular area.

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- 6.6 In accordance with criterion 2.d, suitable access can be achieved and the development / site will not result in an unacceptable risk to highway safety. The current access has capacity for the traffic generated by the use of additional units.
- 6.7 Criterion 2.e requires the compliance with criteria 1. b) – e). How the proposals comply is set out below. Criterion 1.b requires developments to promote a higher quality holiday accommodation, facility and design. It is considered that the proposal is extremely high quality in terms of the design, layout, spacing as well as the benefits of the wider site.
- 6.8 In line with criterion 1.c, the application is accompanied by Landscape Visual Impact Assessments which have assessed the impact of the units and have confirmed that the proposals would not appear visually obtrusive in the landscape. The application is also accompanied by landscaping proposals and biodiversity enhancement masterplans to provide connectivity of ecology across the entire site. The ecological reports identify that there will be significant biodiversity gains and enhancements across the site as a whole as a result of this masterplan, in line with criterion 1.e and Policy NTE/3.
- 6.9 The scheme accords with the Development Principles and other related policies within the LDP in line with criterion 1.d.
- 6.10 Policy NTE/4 of the Conwy LDP permits development if it is shown to be capable of being satisfactorily integrated into the landscape. The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) and landscaping proposals, an Ecological Impact Assessment, incorporating a Tree Survey and Woodland Management Plan.
- 6.11 In line with the advice in PPW and TAN 23, the proposal should be endorsed from an economic perspective and greater weight should be attributed to the economic benefits of development, in particular tourism development in terms of job creation in reception and spin of spending. Notwithstanding the weight given to economic development, there will be no harm to social or environmental matters as a result of this development.
- 6.12 Whilst the proposal only introduced 22 additional pitches (2 of which replace existing dwellings), the applicants are also willing to provide a legal agreement which effectively “transfers” existing consented caravan pitches from a site to the east of the River Conwy at Forest Hills, Bryn Pabo to the site at Gorse Hill. An earlier enquiry to

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Conwy CBC confirmed that this is achievable in principle, through a Section 106 Agreement and we consider that the transfer would allow the consented pitches at Forest Hills to be transferred to a more sustainable location at Gorse Hill where there is infrastructure and services already in situ and where access to public transport is more readily available.

## Tourism and Recreation Statement

- 6.13 The proposed development has been assessed to consider the compliance with planning policies TOU/1, TOU/2 and TOU/4.
- 6.14 The Conwy Local Development Plan (LDP) Sustainable Tourism Strategy, in line with policy TOU/1 emphasises the need to encourage and, where possible, safeguard the tourism sector, and exploit tourism potential, especially relating to the natural and built environment, in order to encourage all year-round tourism.
- 6.15 These proposals form an extension to an existing caravan park. The Gorse Hill Caravan and Lodge Park site is managed to the highest quality. The proposals would be carried out using the same design principles as that of the existing park and further to this, a significant landscaping and woodland planting and management scheme also incorporates numerous biodiversity enhancements across the site as a whole.
- 6.16 The scheme would not result in an unacceptable concentration of sites or pitches at any one locality or area. The Gorse Hill caravan site and its neighbour the Conwy Touring Park are well established holiday sites on the fringe of Conwy. Whilst they are relatively large sites, they are not in an area where there is an over concentration of pitches in one particular area. Conwy town itself is constrained by conservation and heritage designations, any further development of caravan pitches is therefore likely to be developed some distance away from the town, but close enough to provide linked economic benefits to the town. The success in the sale of previously consented twin unit caravans at Gorse hill is an indication in itself that there is unmet demand for additional pitches in the area.
- 6.17 Permitting the proposed development at Gorse Hill Caravan and Lodge Park will contribute positively to the park and its functionality in providing a tourism role within this area of Conwy and will deliver the sort of tourism activity that allows and encourages high customer spend in the local economy but in a sustainable manner.



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- 6.18 Investment into the park is set to continue beyond the siting of these additional caravans. It is intended in time to implement new leisure suite on land next to the existing reception building and provide a new improved access. This development would further make these feasible through additional holiday makers to help provide toward the viability of the proposals.
- 6.19 The proposals will help support The Manor Restaurant which provides an onsite private licensed premises, restaurant and tourist accommodation. Externally the Hall has been restored to its former glory and offers an insight into a typical Conwy Valley manor house. The Manor House boasts features such as oak-panelled fireplaces with other period features from its formation in 1899.
- 6.20 The proposal would offer great economic benefits including further job creation and support of other local businesses and suppliers. In addition, could better sustain the existing jobs on site better throughout the year; including at the Manor Restaurant.
- 6.21 This proposal, would increase the use of the site, and support the objectives of the Conwy LDP, The Future Wales: the national plan 2040 (2021), and help deliver the aims of The Welcome to Wales priorities for the visitor economy 2020 to 2025 (2020) Strategy. The proposal also helps deliver some of the key aims of the Destination Conwy Management Plan 2019 – 2029, which confirms that with tourism a vital element in the county, the Council's new Local Development Plan (currently in preparation) and its wider planning policy will need to encompass, protect and support the existing tourism infrastructure and accommodation base as well as opportunities for future tourism development.
- 6.22 Additionally the proposal complies with Conwy County's Economic Growth Strategy 2017-2027 which aims to build on the unique strengths that the county possesses, to allow Conwy's economy to continue to grow, delivering the ambition of £1billion from tourism.
- 6.23 Caravan holiday accommodation can contribute to spin-off spending within the local economy such as in local pubs, local restaurants, visiting other tourist attractions, local towns and villages, local beaches, castles and historic houses.
- 6.24 The foregoing provides a clear endorsement of the proposal for improvements to the quality of site from an economic perspective and in line with the advice in PPW that greater weight should be attributed to the economic benefits of development, in

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particular tourism development, the proposal should be supported from a national planning policy perspective.

- 6.25 The above re-affirm that the proposed development will successfully contribute towards increased local spend by visitors within the local economy and will support existing and future businesses in the area. This is particularly pertinent in this case as the location of the proposed development is considered to be attractive and accessible to visitors. Gorse Hill as a business provides information at the main reception area and on their web page pointing holidaymakers towards local facilities.
- 6.26 Whilst the owners are keen to further develop facilities to upgrade the site itself, it's recently updated web-page still places great importance on promoting Conwy as a whole and local business in particular. The following extracts from the Gorse Hill Web page provide a clear indication that the business and the site as whole support the wider tourism offer and rural economy of Conwy in particular.

*“The Park is a perfect base for exploring our stunning North Wales coast and countryside.*

*If you can bring yourself to venture out, you'll find activities and attractions of every kind to choose from. Stretch your legs on a sandy beach. Challenge yourself on a championship golf course. Explore the mountains, lakes and waterfalls of Snowdonia. Admire the gardens at Bodnant. Discover Conwy's medieval Castle. Join the fun at one of our festivals. Or visit the nearby Victorian resort of Llandudno to enjoy the great British seaside at its best. Take your pick.”*

- 6.27 In addition to the additional spend by tourists it is important to note the contribution local businesses such as Gorse Hill make towards the local economy throughout the year. This includes spending with local businesses for fuel, maintenance equipment, landscape and electrical contractors. This includes businesses such as Richard Williams Deganwy (builder's merchants); S.J. Ward (electrical); Alpha Business Centre (office supplies and stationery); Major Owen (maintenance machinery); Aberconwy Skip Hire; and Cambrian Caravan Sales to name a few. Direct annual spend with these local businesses equates to a six-figure sum which clearly shows the associated economic benefits of high-quality holiday parks such as Gorse Hill.
- 6.28 The Conwy Local Development Plan (LDP) Sustainable Tourism Strategy, in line with policy TOU/1.emphasises the need to encourage and, where possible, safeguard the tourism sector, and exploit tourism potential, especially relating to the natural and built

environment, in order to encourage all year-round tourism. The basis of this is that the tourism sector results in an increase in unemployment over the winter months in Conwy. This proposal, by allowing the improved access would increase the use of the site, but support the objectives of the LDP, The Wales Spatial Plan (Update 2010), BP/14 'Employment Land Study', North Wales Tourism Strategy (2003 – 2008), Destination Conwy and the Denbighshire and Conwy Sub Regional Economic Study (2007).

### Economic benefits

- 6.29 The Wales National Plan confirms that foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy. Permitting the proposed extension to Gorse Hill Caravan and Lodge Park would contribute positively to the caravan park and its functionality in providing a tourism role within this rural area of Conwy and will deliver the sort of tourism activity that allows and encourages high customer spend in the local economy but in a sustainable manner.
- 6.30 The proposed scheme, through the delivery of high-quality tourist accommodation would deliver economic benefits to the local area, which would contribute to significant additional spend within the local economy. In addition, in this case it would also lead to job creation at the site.
- 6.31 Tourism significantly contributes to the economy of Wales. Between September 2018 and 2019, there were 10.4 million overnight trips to Wales, an increase of 6.3% compared to the previous 12 months. The expenditure at £1,973 million was also up by 9.2%. These increases are higher than those for Britain as a whole with trip volumes only increasing by 0.1%.
- 6.32 For both Wales and GB as a whole the number of visits and total expenditure increased but the number of nights fell - indicating that visitors take shorter overnight stays but spend more while they are there.
- 6.33 In 2017, results from the GB Tourist Survey show that British holidaymakers staying on holiday parks during their domestic holidays spent a total of £2.11 billion – 14.9% of all spending during domestic holidays in Britain – and account for almost a third (29%) of all holiday nights.

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- 6.34 Out of 59.1 million domestic holiday trips in 2017 in Great Britain, 13.7 million trips relate to the parks industry. This makes up just under a quarter (23.2%) of the GB total.
- 6.35 In 2017, spending during domestic holidays which involved staying in a privately-owned static caravan was £271 million, which represents 1.9% of the GB total.
- 6.36 Over a quarter (29.2%) of all domestic holiday nights are spent on parks in Britain. This figure is made up of 8.2% of the GB total in caravan holiday homes to let, 5.2% in privately-owned caravans, 8.9% in touring caravans and 7% in tent/glamping.
- 6.37 The importance of tourism and, in particular, self-contained high quality holiday accommodation on well managed sites is a key part of the economic recovery post Covid 19 Pandemic.
- 6.38 Welsh Government Chief Executives and Head of Planning letter dated 20th July 2020 stated that;
- 6.39 *'Caravan parks and self-catering accommodation are important to the Welsh economy but it has a pronounced seasonal peak in July and August, particularly for caravan parks. While there is a risk this spending may be lost to the industry, the latest consumer survey (29 June -3 July) shows that 25% of UK adults intend to go on a UK short break or holiday by September, while 35% plan on taking their next trip in October or later. The industry has identified a need to boost income and encourage recovery by supporting an extension of the season for caravan parks and self-catering accommodation which are prevented from opening all year.'*
- 6.40 Although this does not refer to the extension of sites, it does show that there is going to be a high demand on UK holidays. It is therefore considered that this development would help meet the future demand for such units.
- 6.41 In addition, the Welsh Government 'Building Better Places, The Planning System Delivering Resilient and Brighter Future – Placemaking and the Covid-19 Recovery', July 2020, places further emphasis on growing Wales' economy in a sustainable manner and specifically as one of the 8 key issues to action 'Reawakening Wales' tourism and cultural sectors'. This section of the guidance (P21) states that;
- 'The planning system strongly supports a diverse, sustainable tourism and culture industry. It brings jobs and income into Wales and it enables people worldwide to enjoy and experience Welsh hospitality, landscape and culture. We want this sector*

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*to resume and recover as soon as it is safe to do so and we support appropriate efforts to build quality and diversity into the visitor and cultural economy. It is particularly important that tourism and culture opportunities that can deliver community benefits to the local area are supported in coastal and rural areas. Tourism and cultural developments may offer a positive way of reusing empty buildings, historic buildings or disused land as part of regeneration schemes.'*

6.42 This section goes on to state that;

*'PPW sets out the positive framework for tourism and culture that encourages the sector to enhance the sense of place in tourist hotspots and to develop new opportunities and cultural experiences in new destinations. The importance of tourism to coastal towns, and its potential role in regeneration projects, is also recognised.'*

6.43 Tourism is clearly a significant part of Welsh Governments plan for post Covid 19 Recovery. These units would expand the offer on an existing site and can be easily and quickly developed to provide additional accommodation in an excellent location which benefits the local economy through additional support to the local businesses and cultural facilities in the area.

### Holiday parks in Wales

6.44 A 2019 report for the UK Caravan and Camping Alliance, 'Pitching the value, 2019 Economic benefits Report: Holiday Parks and Campsites, Wales' provides an independent, evidence-based, understanding of the direct and indirect economic impact/contribution of the holiday park/campsite sector in Wales.

6.45 It is estimated that in 2018 visitors to Welsh holiday parks/campsites spent a total of £1.33bn in the Welsh economy, made up as follows:

- £540.2m on-site spend;
- £366.3m off-site spend; and
- £426m of multiplier impacts.

6.46 Caravan holiday accommodation can contribute to spin-off spending within the local economy such as in local pubs, local restaurants, visiting other tourist attractions, local towns and villages, local beaches, castles and historic houses.

6.47 This visitor expenditure supports 24,677 FTE jobs and contributes £761.4m of GVA to the Welsh economy. North Wales recorded one of the highest visitor impacts with

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visitor expenditure of £865.1million, equivalent to a GVA impact of £494.3 million and to 16,020 supported FTE jobs.

- 6.48 The accommodation type which recorded the highest net visitor impact were owner-occupied caravan holiday homes; with visitor expenditure of £757.0m, equivalent to a GVA impact of £432.5m, and to 14,018 supported FTE jobs.
- 6.49 The above statistics re-affirm that the proposed development, at this very high quality holiday park, would provide an extraordinary quality development and will successfully contribute towards attainment of increased local spend by visitors within the local economy and will support existing and future businesses in the area. This is particularly so in this case as the location of the proposed development is considered to be attractive and accessible to visitors in close proximity to the historic town of Conwy.
- 6.50 In addition to the spend by tourists, it is important to note the contribution local businesses such as Gorse Hill Caravan and Lodge Park can make towards the local economy throughout the year. This includes spending with local businesses for fuel, maintenance equipment, landscape and electrical contractors.
- 6.51 In addition to the figures above, money spent on maintenance by tourers and caravan holiday homeowners adds a further £127.1m of expenditure to the Welsh economy.

## Landscape and Visual Impact Assessment

- 6.52 The Landscape and Visual Impact Assessments confirm that the proposed development can be readily assimilated into the existing landscape.
- 6.53 The application site lies within a Special Landscape Area to which Policy NTE/4 applies. It states that; *'In order to conserve the attributes of the Special Landscape Areas development proposals will have to show particular regard to the character of each locality in order to minimise their impact. Development will only be permitted if it is shown to be capable of being satisfactorily integrated into the landscape. In appropriate cases planning applications should be accompanied by a Landscape and Visual Impact Assessment to assess the visual and landscape impacts of the development.'*
- 6.54 The LVIA considers that the proposal is acceptable within the landscape, particularly when considered in light of the mitigation proposed, and the anticipated longer term

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landscape and ecological benefits of the overall scheme of planting and landscape management. The conclusion goes on to state that the proposed works would not detrimentally affect a National Park/SLA or other Nationally significant landscape and is not visible to receptors in such designated landscapes.

## 7. Conclusion

- 7.1 This Design, Access and Planning Statement accompanies a planning application for the proposed development is for the demolition of two existing dwellings and siting of 22 static caravans, creation of pitches, construction of internal private access road, creation of parking spaces, connection to private sewage treatment plant and landscaping on land at Gorse Hill Caravan and Lodge Park, Llanrwst Road, Conwy.
- 7.2 Caravan and mobile home parks are an existing and accepted part of the rural landscape in Wales and Conwy provided views of them are glimpsed and provided they sit comfortably within their setting. This is certainly the case with Gorse Hill, it is well screened and barely visible in the wider landscape, in stark contrast with many of the more expansive, regimented caravan park developments on the coastal fringes.
- 7.3 Gorse Hill Caravan and Lodge Park delivers the sort of tourism activity that allows and encourages high customer spend in the local economy but in a sustainable manner.
- 7.4 The park has been extremely popular, bringing new investment into the area and also allowing existing park holidaymakers who were considering looking at larger units outside the County as sites such as Plas Coch, Anglesey and The Warren, Abersoch to upgrade and remain in Conwy. This process of continuing improvement is essential to retain high spending tourists in the area.
- 7.5 This proposal has been formulated following a rigorous analysis and assessment of the site context, its value within the landscape and its biodiversity value. As a result the proposal now incorporates comprehensive and significant environmental improvements, including the retention, creation and management of the wildlife habitats.
- 7.6 The proposal complies with up to date development plan policy in the form of Policy TOU/4 which permits improvements to existing caravan, chalet and camping sites within the Rural Development Area of Conwy. This statement has considered all material considerations and there are no significant issues which would outweigh the significant economic benefits of this proposal in the determination of the application.
- 7.7 Along with the significant biodiversity enhancements, this statement has shown that in line with the adopted development plan and recent advice in PPW and given the



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environmental and sustainable credentials of this proposal the application should be supported.

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