





	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p><i>For office use only:</i></p> <p>Representor No. 1169/788</p> <p>Date received: 30/3/15 (eboul)</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Noel Davey	
Address	CPRW/Campaign for Protection of Rural Wales, Caernarfonshire Branch c/o 	
Postcode		
Telephone Number		
Email address		

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?	
	CPRW 12 Touring Caravan Sites
Policy number (please specify)	TWR5
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/> Object	Supporting	<input type="checkbox"/>

12 TWR 5 Touring Caravans

12.1 Context. The proposed JLDP policy continues GUDP policies D19 and D20, presuming in favour of new and extended touring caravan sites in appropriate locations in all areas, whether or not within the AONB or SLAs. The moratorium on new static caravan sites and a limitation on extension of existing sites has been successfully upheld in the GUDP. However, there have been many consents for both new and extended touring caravan sites. While many of the newly consented sites are in relatively well-chosen locations, compared with older sites, there have been cases where inappropriate sites have been allowed¹. At the same time there has been a growth in the number and size of certificated touring caravan Club sites which are not covered by the planning system and some of which are in exposed locations. The lack of evidence regarding the recent spread of touring (as opposed to static) sites is a serious gap in the Topic Paper and JLDP analysis. There is a need to demonstrate whether a continued permissive policy for touring sites is justified or, as we contend, that the proliferation of touring sites is now risking moving out of control in some coastal areas, replicating the earlier problem with static sites. We therefore look for an analysis of planning applications of new or extended touring sites in the last 5 years by broad location within the Plan

¹ 12.2 TWR5/Footnote 1..For example, Tu Hwnt i'r Ffrwd, Morfa Nefyn (C14/1083/42/LL) where successive applications have permitted 41 units on a relatively exposed site in spite of LPA advice that the latest extension is unsuitable because of visual impact on the landscape.

area, summarising the numbers approved or refused and the capacity proposed². We would also expect to see an analysis of licensing information for touring sites and assessment, for example from analysis of GIS or GoogleEarth data, of actual numbers of units on site at different periods of the year, comparable to that for statics. (A CPRW analysis of licensing records and GoogleEarth images in 2008 estimated that there were about 150 touring caravan sites in Gwynedd of which about half were in Dwyfor; there were in addition over 100 certificated club sites).

12.3 Visual Impact of Touring Caravans. We contend that the visual impact of touring caravans on the landscape is being underestimated. This is partly because typical units are getting larger, come equipped with large awnings and decking and are invariably white in colour; they are thus highly obtrusive in the landscape. It is also because a high proportion of 'touring' sites are in effect becoming 'seasonally static' sites. A typical model of site use is for caravans to be brought onto (often reserved) pitches on Mar 1st and remain there till Oct 31st, being occupied by their owners intermittently throughout the season, but mainly in peak holiday periods. During the winter site operators arrange to store many units locally. These caravans are in thus no way 'touring' units. This trend is acknowledged in the Topic Paper (para 4.4.19), but the issue is not adequately addressed in proposed planning policy. Significant visual impact, arising from both colouring and high densities, occurs in practice for a full 8 months of the year. This includes a period of about 3 months when there is little or no deciduous hedging cover which devalues the efficacy of this limiting condition referred to in 7.3.78. It is therefore no longer the case that touring sites can be considered acceptable in land use planning terms because they are in practice progressively imposing semi-permanent, not transient effects on the environment, contrary to the statement in 7.3.74. We argue that condition (7) in TWR5 *'that the site is used for touring purposes only and units are removed from the site during periods when not in use'* does not now reflect common practice in the real world and is being neither monitored nor enforced.

12.4 Cumulative Impact. The proliferation of touring caravan sites also means that there is an increasing risk of cumulative visual impact on the landscape. This should be recognised explicitly as a potential issue in planning applications, in the same way as it is meant to be considered in those for wind turbines.

² 12.5 TWR5/Footnote 2 A rapid analysis of the Gwynedd Planning Application database suggests that over the last 5 years there has been an annual average of about 30 PAs involving caravans of which 75% have been in Dwyfor. At least 40% of these (about 1/month) relate to touring caravans.

Rough Analysis of Gwynedd Planning Applications for Caravans		
PA Flag Words	No. PAs 1/1/10-1/3/2015	No. since 1999 to date
Caravans	121	433 (29/yr)
Caravan sites	40	119
Touring caravans	63 (13/yr)	241 (16/yr)
Static caravans	26	128
Static caravan	30	166
Net 'caravan' PAs: Gwynedd	155 (31/yr)	Note: excludes SNPA
of which : Dwyfor	116 (75%)	
Arfon	30 (19%)	
Meirionnydd	9 (6%)	

12.6 TWR 5/Semi-permanence of Tourers. The trend towards semi-permanence is implicitly recognised in TWR5 conditions (2) '*Avoid excessive areas of hard standing*' and (3) '*Have limited physical connection to the ground*'. This is amplified in paragraphs 7.3.75-7.3.77 which aim to encourage temporary use and exclude permanent physical changes to a site such as the installation of concrete bases or mains water and drainage services for individual pitches. While we support these intentions, we question, again, whether the planning authority has the capacity to monitor and enforce such conditions. In principle, we support the idea in 7.3.77 that any proposals including permanent structures should be dealt with under TWR3 for static sites. But how effectively would such policies be enforced in practice and would they also be applied to existing sites? Also, fully static caravan sites should not be confused with seasonally static 'touring sites' where the size and pattern of use of units are different.

12.7 TWR 5/Enforcement Issues. We recognise this tendency towards semi-permanence may reflect what the market demands. However, this model is contributing to the risk of greater landscape damage, while failing to maximise local incomes (empty caravans occupying pitches will not be generating much local expenditure other than rent to the site operator). We would oppose any attempt to further extend the season for touring caravans and we support the intentions of policy to establish a genuine touring model in preference to a drift towards seasonal static sites if they could be applied effectively and across both new and existing sites.

12.8 TWR 5/Needs. What seems to be required is a differentiation between genuine touring and camping sites and de facto seasonal static sites. The latter should be treated more in line with the policy for statics (TWR3).

12.9 TWR5/Tourer Site Extension. We support the provisions for extending existing touring sites in exchange for genuine improvements to landscaping on the same model as for static caravans. However, we would expect to see some guidance regarding a limitation of the scale of such extensions comparable to that for statics. Improved landscaping, rather than colouring, needs to be the main focus here to reduce visual impact until some headway is made in getting national manufacturers to offer colour standards other than white.

12.10 TWR 5/Amendment. Following a precautionary principle we argue that TWR5 should be amended to exclude new touring sites in the most sensitive landscape areas. As outlined above, this is because evidence is needed to demonstrate the impact of the present permissive policy; in our view the visual impact of touring caravans is being underestimated; and the planning authority has not demonstrated an adequate capacity to monitor and enforce a genuinely temporary character in touring sites, thus reversing a drift towards seasonal static sites.

12.11 TWR 5 Winter Storage. Para 7.3.74 stipulates that caravans should be removed during winter months. However, there is no reference to acceptable winter storage arrangements comparable to GUDP Policy D21.

12.12 The meaning of Para 7.3.80 needs clarifying.

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

12.13 Summary TWR5

We oppose the continuation of a permissive policy for touring caravan sites in the most sensitive landscape areas, in the absence of evidence regarding its impact. We believe the visual impact of tourers, including cumulative impact, is being underestimated and it risks being as great as that acknowledged for static sites in the past. As a precautionary policy we seek a moratorium on new touring sites within AONBs, SLAs and within 2 km of the coast and some limitation on the size of extensions of existing sites. We support policies for extension of existing sites, provided limits are specified, in exchange for genuine environmental improvements, and provided these are actually monitored and enforced.

2d. Please detail the changes you wish to see made to the Deposit Plan.

12.14 TWR5 Changes Sought :

Within the AONBs, SLAs and in other areas within 2 km of the coast, proposals for new touring caravan will be refused.

Proposals for new touring sites in other areas, proposals for genuinely transient camping sites in all areas and proposals for limited extensions to existing sites or additional pitches in all areas: will be granted provided they conform to the following criteria: [1-7 as deposit draft text.]

2dd. Is the Deposit Plan sound?

Yes No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.

Procedural				Consistency				Coherence & Effectiveness										
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4
												1		2	X	3	X	4

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **467**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **POLISI TWR5**

Section: **POLICY TWR5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Rydym yn gwrthwynebu meini prawf 3 a 7 polisi TWR 5. Dylid diwygio maen prawf 3 i ddarllen: gellir ei symud odd ar y safle os nad yw'n cael ei ddefnyddio mwyach.

Representation Summary:

We object to criteria 3 and 7 of policy TWR 5. criterion 3 could be amended to read:
capable of being removed off the site if the use has been discontinued.

Sylw Llawn / Full Representation:

An objection is made to criterion 3 of this policy as may forms of alternative camping do require physical connection to the ground. The removal of this connection out of season may not be necessary or appropriate in many cases. For example, with the extended holiday season delivering economic benefits often for all but a short 6 week break in mid-winter it would be unsustainable to remove and store tent or camping pod bases for such a short period. The retention of such bases would be commensurate with the retention of hard surfaced under touring caravan pitches.

Criterion 7 should be deleted as touring or alternative camping units/large tents and pods etc should not need to be removed when not in use. Policy should only be concerned with the land use and appearance of the touring caravans or alternative form of camping. For example, the land use impact and visual appearance of a touring caravan or tent is no different should that pitch be occupied by a single "seasonal" caravan or tent or by several caravans or tents throughout the season.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

criterion 3 could be amended to read:
capable of being removed off the site if the use has been discontinued.

Profion Cadernid / Soundness Tests: x, iii, iv, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **468**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **7.3.74**

Section: **7.3.74**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylid gwneud i ffwrdd â'r geiriau "Dylid symud pob uned oddi ar y safle pan nad yw'n cael ei defnyddio ac yn ystod misoedd y gaeaf" gan fod carafanau teithiol, pebyll a phodiau gwersylla yn cael aros ar y tir "pa na chânt eu defnyddio". At hyn, mae nifer o'r meysydd carafanau teithio a gwersyllfeydd amgen yn agored yn ystod rhai o "fisoedd y gaeaf" ond nid i gyd. O'r herwydd mae'r testun sy'n gofyn am eu symud yn ystod misoedd y gaeaf yn byrhau'r tymor gwyliau, yn groes i'r polisi cenedlaethol.

Representation Summary:

The words "When not in use and during the winter months all units should be removed from the site" should be deleted as touring caravans, tents and camping pods can stay on the land "when not in use". Additionally, many touring caravan and alternative camping sites are open during some but not all of the "winter months". the text which requires their removal during winter months therefore has the effect of shortening the holiday season contrary to national policy .

Sylw Llawn / Full Representation:

The words "When not in use and during the winter months all units should be removed from the site" should be deleted as touring caravans, tents and camping pods can stay on the land "when not in use". Additionally, many touring caravan and alternative camping sites are open during some but not all of the "winter months". the text which requires their removal during winter months therefore has the effect of shortening the holiday season contrary to national policy .

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

delete "when not in use and during the winter months"

Profion Cadernid / Soundness Tests: x, iii, iv, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **470**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **7.3.76**

Section: **7.3.76**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw geiriad paragraff 7.3.76 yn gyson ag amcanion Polisi TWR5 sy'n hyrwyddo sefydlu safleoedd teithiol a phebyll o safon uchel mewn lleoliadau priodol ac yn cydnabod cyfraniad mae safleoedd teithiol a phebyll yn ei wneud i'r ystod o lety gwyliau sydd ar gael i ymwelwyr. Bydd y bwriad i gyfyngu unrhyw isadeiledd dros dro i gyfleusterau basig gyda dim dreiniau na dwr yn mynd i gyfyngu darpariaeth o safleoedd teithiol a phebyll o safon uchel. Mae angen i safleoedd teithiol a phebyll o safon uchel ddarparu cysylltiadau dwr a dreinio mae ymwelwyr sy'n gwario llawer yn gofyn amdano.

Representation Summary:

The wording of paragraph 7.3.76 contradicts the aims of Policy TWR5 which is to facilitate the establishment of high quality touring and camping sites in appropriate locations and recognises the contribution made by high quality touring and camping sites to the range of holiday accommodation available for visitors. The restriction to limit any temporary structures to basic facilities with no drainage or water will inhibit the provision of high quality touring and camping sites. The highest quality alternative camping sites do need to provide water and drainage connections that are now sought by high spend tourists.

Sylw Llawn / Full Representation:

The wording of paragraph 7.3.76 contradicts the aims of Policy TWR5 which is to facilitate the establishment of high quality touring and camping sites in appropriate locations and recognises the contribution made by high quality touring and camping sites to the range of holiday accommodation available for visitors.

The restriction to limit any temporary structures to basic facilities with no drainage or water will inhibit the provision of high quality touring and camping sites. The highest quality alternative camping sites do need to provide water and drainage connections that are now sought by high spend tourists.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Delete the wording:

They should only provide basic facilities for sleeping, seating and eating without installation of water services or provision of drainage facilities for WC, showers and washing. This ensures that such structures do not generate a level of permanence that could increase the level of landscape impact and site restoration should removal of the structures be required

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **472**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **7.3.75**

Section: **7.3.75**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae modd asesu maint a derbynioldeb ardaloedd llecynnau caled yn ddigonol dan Bolisi TWR 5 heb fod angen "gwaharddiad" effeithiol fel y nodir ym mharagraff 7.3.75

Representation Summary:

The extent and acceptability of areas of hard standings can be adequately assessed under Policy TWR 5 without the need to have an effective "embargo" as set out within para. 7.3.75

Sylw Llawn / Full Representation:

The extent and acceptability of areas of hard standings can be adequately assessed under Policy TWR 5 without the need to have an effective "embargo" as set out within para. 7.3.75

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

Delete "The use of concrete bases is not considered acceptable"

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **473**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **7.3.77**

Section: **7.3.77**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid ydy unedau campio teithiol neu amgen yn cael ei gategoreiddio fel carafán sefydlog pan maent wedi cysylltu gyda phrif wasanaeth dŵr a gwastraff. Dileu 7.3.77

Representation Summary:

Touring or alternative camping units do not become classified as "static" caravans of permanent accommodation simply by virtue of the fact that they may be connected to mains water or drainage. Delete 7.3.77

Sylw Llawn / Full Representation:

Touring or alternative camping units do not become classified as "static" caravans of permanent accommodation simply by virtue of the fact that they may be connected to mains water or drainage.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **475**

Enw / Name: **Cadnant Planning (Mr Rhys Davies) [1366]**

Rhan: **7.3.78**

Section: **7.3.78**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae'r polisi hwn yn gyfyngol heb fod rhaid ac yn groes i Bolisi Cynllunio Cenedlaethol gan fod modd ymestyn manteision economaidd o nifer o ffurfiau o wersyllfeydd amgen i gyfnodau sy'n ymestyn dros 12 mis bron a bod.

Representation Summary:

This policy is unduly restrictive and contrary to National Planning Policy as the economic benefits of many forms of alternative camping sites can be extended to periods covering almost 12 months.

Sylw Llawn / Full Representation:

This policy is unduly restrictive and contrary to National Planning Policy as the economic benefits of many forms of alternative camping sites can be extended to periods covering almost 12 months.

Newid(iadau) i'r Cynllun

Diwygio'r testun i ddarllen cyfyngu'r cyfnod gweithredol y safle rhwng 1af Mawrth a 6ed Ionawr y flwyddyn ca

Change(s) to the Plan

Amend the text to read limiting the operational period of the site to between 1st March and 6th January the following year.

Profion Cadernid / Soundness Tests: x, iii, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **226**

Enw / Name: **Ellesmere Sand & Gravel Company Limited [2686]**

Rhan: **POLISI TWR5**

Section: **POLICY TWR5**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleoedd llety, gweryllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol

Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Newid(iadau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **98**

Enw / Name: **BH&HPA [2733]**

Rhan: **POLISI TWR5**

Section: **POLICY TWR5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Er derbyn fersiwn ddrafft polisi TWR5 yn gyffredinol, trwy ddefnyddio maen prawf 7 methir y profion cadernid a osodir yn y Cynllun Datblygu Lleol. Nid oes rheswm cynllunio dros osod terfyn ar hyd cyfnod aros a byddai hyn yn gorchymyn yn afresymol sut y dylid rhedeg parc. Ni fyddai modd gorfodi'r angen na'i fonitro ac nid yw'r cyfryw angen yn unol â pholisïau cynllunio lleol eraill mewn ardaloedd gerllaw. O'r herwydd, gofynnir gwneud i ffwrdd â'r elfen hon o Bolisi TWR5. Fel bod Polisi TWR5 yn 'gadarn' dylid diwygio'r testun cysylltiedig. Gweler sylw llawn am newidiadau penodol.

Representation Summary:

Whilst draft Policy TWR5 is generally accepted, the imposition of criterion 7 fails to meet the tests of soundness set down for the LDP. There is no planning reason for the imposition of limitation on length of stay and this would unreasonably dictate how a park is operated. The requirement could not be enforced or monitored and is not in accordance with other local planning policies in adjoining areas. It is therefore requested that this element of Policy TWR5 is removed. In order for Policy TWR5 to be 'sound' the accompanying text should be amended. See full submission for detailed changes suggested.

Sylw Llawn / Full Representation:

REPRESENTATIONS ON BEHALF OF
THE BRITISH HOLIDAY AND HOME PARK ASSOCIATION (BH&HPA)

We act on behalf of the British Holiday and Home Park Association (BH&HPA) and provide the following representation to Draft Policy TWR5: Touring Caravan, Camping and Temporary Alternative Camping Accommodation of the Anglesey and Gwynedd Deposit Joint Local Development Plan (2011 - 2016) as follows;

National Planning Policy

Planning Policy Wales (PPW) Edition 7 (July 2014) provides material guidance as to how Development Plan Policies throughout Wales should be planned and formulated. With specific reference to the tourism industry the Welsh Assembly Government's aim for tourism is for:

"Tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental well-being of Wales"

Paragraph 11.1.7 of PPW additionally states that states that:

"In rural areas, tourism related development is an essential element in providing for a healthy, diverse, local and national economy. It can contribute to the provision and maintenance of facilities for local communities. Here too development should be sympathetic in nature and scaled to the local environment and to the needs of visitors and the local community."

Paragraph 12 of TAN 13 (Tourism) states that:

"In preparing development plans, local planning authorities should investigate the adequacy of facilities for both the static and touring caravanner 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

Sylwadau Dros y We / Representations via the Internet

for the purposes."

2c. POLICY TWR5: TOURING CARAVAN, CAMPING AND TEMPORARY ALTERNATIVE CAMPING ACCOMMODATION

A strong objection is made to criterion 7 of this Policy as it fails tests C1, C2, CE1, CE3 and CE4.

The requirement for any touring units to be removed from the site when not in use is unacceptable and not a planning issue. If a site has been found acceptable to accommodate touring caravans throughout an agreed operating season and those touring caravans are occupied for holiday purposes only during that defined season then there are no other planning matters that need to be addressed through planning policy.

It makes no difference, in planning, land use, visual impact terms whether a touring pitch is occupied by a single touring caravan throughout the season or by several different touring caravan throughout the year. It should be strictly the discretion of the touring caravan site operator, as influenced by market forces, on what basis a touring caravan pitch should be occupied and it is fundamentally wrong for a Local Planning Authority to dictate how a touring caravan park should operate. The only matters the Local Planning Authority should concern itself with are (1) is the caravan a 'touring caravan' and does it meet the legal definition of such a unit; and (2) is the touring caravan used for holiday purposes.

In having regard to the tests of soundness we would comment as follows :

Test C1 - This is not a policy requirement in adjoining Local Planning Authorities and therefore the subject criterion places touring parks within the plan area at a significant commercial disadvantage to these adjoining areas and competing touring parks.

Test C2 - PPW requires tourism development to be sympathetic to the needs of visitors and the local community. The requirement for touring units to be removed from the site when not in use does not fulfil either of those requirements.

Test CE1 - Criterion 7 is not compatible with the development plans prepared by neighbouring authorities.

Test CE2 - Criterion 7 is not realistic or appropriate considering the requirement for touring caravans to be occupied on a holiday basis only and to be restricted to a holiday season. There is no sound planning reason for touring caravans to be required to be taken off site when not in use during the permitted operating season and this is not a planning issue.

Test CE3 - There are no clear mechanism for the implementation and monitoring of the requirements of criterion 7 and therefore it should be removed from the Policy.

Test CE4 - The requirement for a touring unit to be removed from site when not in use does not provide the flexibility for sites to deal with the demand of holidaymakers or to base their business on market forces. It is not the role of the Local Planning Authority to dictate how a caravan park is operated. The length of stay of individual touring units on an approved touring unit pitch within a defined holiday season is not a concern for the Local Planning Authority and should not form part of any Planning Policy.

In support of this representation we produce an extract from the Inspector's Report into the Eryri (Snowdonia National Park) Local Plan Review. Therein it will be noted that when addressing the potential policy inclusion of limitation as to length of stay the appointed Inspector states within paragraph 12.7.3:

"If operators are content to allow visitors to leave their caravans for periods more than 4 weeks, the Authority should only seek to prevent this for legitimate planning reasons. The fact that there may be less space available for visitors is not a valid planning argument."

Sylwadau Dros y We / Representations via the Internet

Supporting Text

Paragraph 7.3.75

This is too restrictive. Whilst criteria 2 of the Policy states that excessive use of hard standing should be avoided it is unacceptable to completely forbid the use of concrete bases. There are many circumstances where concrete bases are required on touring caravan parks and whilst these parks remain in the minority, the topography and individual site circumstances often result in the requirement to provide robust and safe hardstanding pitches.

Furthermore, many high quality 'comfort' pitches on 5-star holiday parks require this type of hardstanding pitch and it is clearly unreasonable to place an existing touring caravan park at a disadvantage in terms of the overall Welsh Tourism Board grade it can attain if concrete touring caravan bases are precluded.

The issue of concrete bases on touring caravan parks should be more properly dealt with on a case by case basis whereby a planning application can be made by an individual site operator if concrete bases are desired. This is a more realistic land use scenario as there are no permitted development rights to provide concrete bases under the requirements of a Touring Caravan Site Licence. Any preclusion should therefore be removed from the policy text.

Paragraph 7.3.76

The wording of paragraph 7.3.76 contradicts the aims of Policy TWR5 as set out in the earlier paragraph under 7.3.70 which states:

"The aim of this policy is to facilitate the establishment of high quality touring and camping sites in appropriate locations and recognises the contribution made by high quality touring and camping sites to the range of holiday accommodation available for visitors."

However, the restriction to limit any temporary structures to only basic facilities is not going to enable site operators to provide the high quality touring and camping sites that are now sought by holidaymakers. This would be very damaging to the industry and in turn the local economy.

For the reasons stated above this paragraph fails tests C1, C2, CE1, CE2 and CE4.

Paragraph 7.3.77

It is not appropriate for touring caravan development that include mains water and drainage connection to be adjudged under an entirely separate policy (TWR3) which was been formulated to specifically address Static Caravan and Chalet Sites. There needs to be firm distinction between applications for touring caravans as opposed to static caravans and paragraph 7.3.77 should be removed on this basis.

Newid(iadau) i'r Cynllun

Amended Policy1. Remove criterion 7 from the Policy.2. Paragraph 7.3.74 - Remove, "When not in use

Change(s) to the Plan

Amended Policy

1. Remove criterion 7 from the Policy.
2. Paragraph 7.3.74 - Remove, "When not in use"
3. Paragraph 7.3.75 - Remove "The use of concrete bases is not considered acceptable."
4. Paragraph 7.3.76 - Remove "In order to ensure that these temporary structures are being used...landscape impact and site restoration should removal of the structures be required."
5. Remove paragraph 7.3.77
6. Amend paragraph 7.3.78 to allow for season 1st March and 31st October in the same year.

Sylwadau Dros y We / Representations via the Internet

Profion Cadernid / Soundness Tests: x, iii, iv, vii, viii, ix

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **227**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI TWR5**

Section: **POLICY TWR5**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleoedd llety, gweryllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol

Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **199**

Enw / Name: **Kingsbridge Caravan Park (Mr Andrew Bate) [2778]**

Rhan: **POLISI TWR5**

Section: **POLICY TWR5**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylid caniatáu i feysydd carafanau teithiol storio carafanau i gwsmeriaid ar yr amod y cânt eu cadw mewn mannau nad ydynt yn tynnu sylw. Mae hyn yn elfen allweddol o weithgareddau carafanau teithiol ac nid oes cyfeiriad tuag at y mater yn y ddogfen polisi. Bydd storio unedau yn cael effaith positif ar leihau'r traffig ar brif ffyrdd ac ar ffyrdd cefn gwlad. Bydd hefyd yn lleihau llygredd ceir oherwydd ni fydd y car yn tynnu carafán.

Representation Summary:

Touring caravan parks should be allowed to store caravans for customers provided they are located in unobtrusive areas. This is a key element of the touring park activity and does not appear to be addressed in the policy document. Storage of units has the advantage of reducing disruption on main roads and country lanes and above all reduces vehicle emissions by way of improved fuel economy of the vehicle which would otherwise be towing a caravan.

Sylw Llawn / Full Representation:

Touring caravan parks should be allowed to store caravans for customers provided they are located in unobtrusive areas.

Newid(iadau) i'r Cynllun

Mae hyn yn elfen allweddol o weithgareddau carafanau teithiol ac nid oes cyfeiriad tuag at y mater yn y ddo

Change(s) to the Plan

This is a key element of the touring park activity and does not appear to be addressed in the policy document. Storage of units has the advantage of reducing disruption on main roads and country lanes and above all reduces vehicle emissions by way of improved fuel economy of the vehicle which would otherwise be towing a caravan.

Profion Cadernid / Soundness Tests: x, viii

Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisiau cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai manau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisiau perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
 - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
 - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gwelededd yr AHNE.
 - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
 - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
 - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

8. **Polisi TWR 4** – Deiliadaeth Gwyliau. Roedd pryder am ganiatáu i safleoedd carafannau sefydlog/ sialetau fod yn agored 12 mis y flwyddyn. Heb adnoddau digonol i ellir monitro'r sefyllfa a mae posibilrwydd o fyw'n barhaol yn yr unedau – heb dalu trethi.
- 784 9. **Polisi TWR 5-** Safleoedd Carafannau Teithiol, Gwersylla a Llety Gwersylla Amgen dros dro. Roedd aelodau wedi sylw fod cynydd mewn ceisiadau a chryn bwysedd gan y math yma o ddatblygiad yn ardal Llŷn. Gofynwyd os sail i'r polisi ac oedd yna ddadansoddiad o gynydd mewn unedau/ effaith datblygiadau newydd wedi ei wneud? Credir y dyliai'r polisi fod yn fwy caeth oddi mewn, a gerllaw, yr ardal ddynodedig.
9. **Polisi PCYFF 2 – Dylunio a Siapio** – credir y dylai fod cyfeiriad penodol at ddylunio safonol sy'n gweddu i'r cyd-destun yn yr AHNE.
10. **Gorfodaeth.** Credir fod angen blaenoriaeth i fonitrio cydymffurfiaeth hawl cynllunio, amodau cynllunio, amodau tirweddu ac amodau preswyliaeth.
11. **Cynllun Rheoli'r AHNE** – mae hwn yn gynllun statudol a chreir y dylai fod cyfeiriad penodol ato yn y polisiau perthnasol.
12. **Tai newydd.** Roedd pryder am lefel y ddarpariaeth dai yn ardal Llŷn ac effaith posibl hynny ar y gymdeithas a lles yr Iaith Gymraeg. Yn benodol roedd pryder am y-ddarpariaeth ym Motwnnog a Phwllheli sydd yn ymddangos yn ormodol o ystyried maint a chymeriad yr anheddleoedd.