

To: Chair and Members of the Planning Committee

Date: 25 August 2020

Direct Dial: 01824 712589

e-mail: democratic@denbighshire.gov.uk

Dear Councillor

You are invited to attend a meeting of the **PLANNING COMMITTEE** to be held on 2 September 2020 at **9:30 A.M**

**PLEASE NOTE: DUE TO THE CURRENT RESTRICTIONS ON TRAVEL AND THE REQUIREMENT FOR SOCIAL DISTANCING THIS MEETING WILL NOT BE HELD AT ITS USUAL LOCATION. THIS WILL BE A REMOTE MEETING BY VIDEO CONFERENCE AND NOT OPEN TO THE PUBLIC.**

Yours sincerely

G Williams  
Head of Legal, HR and Democratic Services

## **AGENDA**

### **1 APOLOGIES**

### **2 DECLARATIONS OF INTEREST (Pages 31 - 32)**

Members to declare any personal or prejudicial interests in any business identified to be considered at this meeting.

### **3 URGENT MATTERS AS AGREED BY THE CHAIR**

Notice of items which, in the opinion of the Chair, should be considered at the meeting as a matter of urgency pursuant to Section 100B(4) of the Local Government Act, 1972.

### **4 MINUTES (Pages 33 - 38)**

To confirm the accuracy of the minutes of the Planning Committee meeting held on the 15 July 2020 (copy attached).

**APPLICATIONS FOR PERMISSION FOR DEVELOPMENT (ITEMS 5 - 7) -**

Applications received requiring determination by the committee were submitted together with associated documentation. Reference was also made to late supplementary information (blue sheets) received since publication of the agenda which related to particular applications. It was agreed to vary the order of the agenda in accordance with the late supplementary information.

**5 APPLICATION NO. 45/2020/0327 - 18/20 VALE ROAD, RHYL (Pages 39 - 60)**

To consider an application for variation of condition number 2 of planning permission reference APP/R68301 A/04/1170834 to extend opening hours to 07.00 to 20.00 Monday to Saturday and 09.00 to 17.00 on Sunday at Units 2A & 2B 18/20, Vale Road, Rhyl, LL18 2BU (copy attached).

**6 APPLICATION NO. 47/2020/0237 - FARMERS ARMS, WAEN, ST ASAPH (Pages 61 - 84)**

To consider an application for the Operational development required in association with use of land as a caravan and motorhome club certified location / exempted caravan site comprising formation of a vehicular access, internal access tracks and hardstanding areas, drinking water tap, electricity hook up points, chemical toilet waste disposal facility with rinsing tap, wildlife pond and landscaping (partly retrospective) at Land Adjacent to Farmers Arms, Waen, Llanelwy, LL17 0DY (copy attached)

**7 APPLICATION NO. 47/2020/0420 - PENISA'R MYNYDD CARAVAN PARK, CAERWYS ROAD, RHUALLT (Pages 85 - 98)**

To consider an application for the Deletion of Condition 8 of Planning Permission 47/2003/0132 and deletion of Condition 7 on Appeal Decision APP/A/03/1117348 to allow for an extended 12 month all year round holiday season at Penisa'r Mynydd Caravan Park Caerwys Road Rhuallt St. Asaph (copy attached).

## **MEMBERSHIP**

### **Councillors**

Councillor Joe Welch (Chair)

Councillor Alan James (Vice-Chair)

Mabon ap Gwynfor  
Ellie Chard  
Ann Davies  
Peter Evans  
Brian Jones  
Tina Jones  
Gwyneth Kensler  
Christine Marston  
Melvyn Mile

Bob Murray  
Merfyn Parry  
Pete Prendergast  
Peter Scott  
Tony Thomas  
Julian Thompson-Hill  
Emrys Wynne  
Mark Young

**COPIES TO:**

All Councillors for information  
Press and Libraries  
Town and Community Councils

This page is intentionally left blank

## **WELCOME TO DENBIGHSHIRE COUNTY COUNCIL'S PLANNING COMMITTEE**

### **HOW THE MEETING WILL BE CONDUCTED – Virtual arrangements June 2020**

Unless the Chair of the Committee advises to the contrary, the order in which the main items will be taken will follow the agenda set out at the front of this report.

#### **General introduction**

The Chair will open the meeting at 9.30am and welcome everyone to the Planning Committee.

The Chair will ask if there are any apologies for absence and declarations of interest.

The Chair will invite Officers to make a brief introduction to matters relevant to the meeting.

Officers will outline as appropriate items where we have received requests for deferral, withdrawals, special reports, and any Part 2 items where the press and public may be excluded. Reference will be made to additional information prior to the start of the meeting, including the late representations/amendments summary sheets ('Blue Sheets') and any supplementary or revised plans relating to items for consideration.

The Blue Sheets' contain important information, including a summary of material received in relation to items on the agenda between the completion of the main reports and the day before the meeting. The sheets also set out the proposed running order on planning applications.

In relation to the running order of items, any Members seeking to bring forward consideration of an item will be expected to make such a request immediately following the Officer's introduction. Any such request must be made as a formal proposal and will be subject to a vote.

The Planning Committee currently consists of 19 elected Members. In accordance with protocol, 10 Members must be present at the start of a debate on an item to constitute quorum and to allow a vote to be taken.

County Council Members who are not elected onto Planning Committee may attend the meeting and speak on an item, but are not able to make a proposal to grant or refuse, or to vote.

## **CONSIDERING PLANNING APPLICATIONS**

### **The sequence to be followed**

The Chair will announce the item which is to be dealt with next. In relation to planning applications, reference will be made to the application number, the location and basis of the proposal, the relevant local Members for the area, and the Officer recommendation.

If any Member is minded to propose deferral of an item, including to allow for the site to be visited by a Site Inspection Panel, the request should be made, with the planning reason for deferral, before any public speaking or debate on that item.

Where relevant, the Chair will offer the opportunity for Members to read any late information on an item on the 'Blue Sheets' before proceeding.

Prior to any debate, the Chair may invite Officers to provide a brief introduction to an item where this is considered to be worthwhile in view of the nature of the application. In addition the Officers may read out any prepared speech by an

interested party for or against the application. The speech provided against any application will be read out first.

The Chair will announce that the item is open for debate and offer Members opportunity to speak and to make propositions on the item.

If any application has been subject to a Site Inspection Panel prior to the Committee, the Chair will normally invite those Members who attended, including the Local Member, to speak first.

On all other applications, the Chair will permit the Local Member(s) to speak first, should he/she/they wish to do so.

Members are normally limited to a maximum of five minutes speaking time, and the Chair will conduct the debate in accordance with Standing Orders.

Once a Member has spoken, **he/she should not speak again** unless seeking clarification of points arising in debate, and then only once all other Members have had the opportunity to speak, and with the agreement of the Chair.

At the conclusion of Members debate, the Chair will ask Officers to respond as appropriate to questions and points raised, including advice on any resolution in conflict with the recommendation.

Prior to proceeding to the vote, the Chair will invite or seek clarification of propositions and seconders for propositions for or against the Officer recommendation, or any other resolutions including amendments to propositions. Where a proposition is made contrary to the Officer recommendation, the Chair will seek clarification of the planning reason(s) for that proposition, in order that this may be recorded in the Minutes of the meeting. The Chair may request comment from the Legal and Planning Officer on the validity of the stated reason(s).

The Chair will announce when the debate is closed, and that voting is to follow.

## **The voting procedure**

Before requesting Members to vote, the Chair will announce what resolutions have been made, and how the vote is to proceed. If necessary, further clarification may be sought of amendments, new or additional conditions and reasons for refusal, so there is no ambiguity over what the Committee is voting for or against.

The voting will proceed with the Chair going around all the Planning Committee members eligible to vote to ask for their verbal "For", "Against" or "Abstain" vote. The votes will be marked down and the Chair will then announce whether that application has been approved or refused.

**Croeso i Bwyllgor Cynllunio,  
Sir Ddinbych**

**Welcome to  
Denbighshire Planning Committee**

**2 Medi 2020**

**2 September 2020**



**Eitem Agenda 5 / Agenda Item 5**

**45/2020/0327**

**18/20 Vale Road, Rhyl**



# Eitem Agenda 5 / Agenda Item 5

Page 9





## Eitem Agenda 5 Agenda Item 5



# Eitem Agenda 5 / Agenda Item 5





## Eitem Agenda 5 / Agenda Item 5



# Eitem Agenda 5 / Agenda Item 5

Page 13



**Eitem Agenda 6 / Agenda Item 6**

**47/2020/0237**

**Farmers Arms, Waen,  
St Asaph**

# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6





# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6



**Eitem Agenda 6 /  
Agenda Item 6**



**Eitem Agenda 6 /  
Agenda Item 6**



# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6





# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6



# Eitem Agenda 6 / Agenda Item 6



Eitem Agenda 7 / Agenda Item 7

**47/2020/0420**

**Penisa'r Mynydd Caravan Park,  
Caerwys Road, Rhualt**

# Eitem Agenda 7 / Agenda Item 7



# Eitem Agenda 7 / Agenda Item 7



## LOCAL GOVERNMENT ACT 2000

### Code of Conduct for Members

### DISCLOSURE AND REGISTRATION OF INTERESTS

I, *(name)*

a \*member/co-opted member of

*(\*please delete as appropriate)*

**Denbighshire County Council**

**CONFIRM** that I have declared a **\*personal / personal and prejudicial** interest not previously declared in accordance with the provisions of Part III of the Council's Code of Conduct for Members, in respect of the following:-

*(\*please delete as appropriate)*

Date of Disclosure:

Committee *(please specify)*:

Agenda Item No.

Subject Matter:

Nature of Interest:

*(See the note below)\**

Signed

Date

\*Note: Please provide sufficient detail e.g. 'I am the owner of land adjacent to the application for planning permission made by Mr Jones', or 'My husband / wife is an employee of the company which has made an application for financial assistance'.

This page is intentionally left blank



## PLANNING COMMITTEE

Minutes of a meeting of the Planning Committee held via WebEx on Wednesday, 15 July 2020 at 9.30 am.

### PRESENT

Councillors Ellie Chard, Ann Davies, Peter Evans, Alan James (Vice-Chair), Brian Jones, Tina Jones, Gwyneth Kensler, Christine Marston, Melvyn Mile, Bob Murray, Merfyn Parry, Pete Prendergast, Tony Thomas, Julian Thompson-Hill, Joe Welch (Chair), Emrys Wynne and Mark Young

### ALSO PRESENT

Development Control Manager (PM), Planning Officer (PG), Solicitor (AS), Democratic Services Manager (SP) and Committee Administrator (SLW)

#### 1 APOLOGIES

Apologies for absence were received from Councillors Mabon ap Gwynfor and Peter Scott

#### 2 DECLARATIONS OF INTEREST

Councillor Tina Jones declared a personal and prejudicial interest in Agenda Item 7 (Oaktree Centre, Rhyl).

Councillor Julian Thompson-Hill declared a personal interest in Agenda Item 7 (Oaktree Centre, Rhyl).

Councillor Brian Jones declared a personal and prejudicial interest in Agenda Item 8 (Brynlithrig Bach Cottage, Rhuallt).

#### 3 URGENT MATTERS AS AGREED BY THE CHAIR

No urgent matters had been raised.

#### 4 MINUTES

The minutes of the Planning Committee held on 17 June 2020 were submitted.

**Accuracy** – the meeting was conducted via WebEx and not held in the Council Chamber.

Councillor Emrys Wynne clarified that he was unable to join the meeting due to technical issues but was listed as being present.

**RESOLVED** that, subject to the above, the minutes of the meeting held on 17 June 2020 be received and confirmed as a correct record.

## **APPLICATIONS FOR PERMISSION FOR DEVELOPMENT (ITEMS 5 - 8) -**

Applications received requiring determination by the committee were submitted together with associated documentation. Reference was also made to late supplementary information (blue sheets) received since publication of the agenda which related to particular applications. It was agreed to vary the order of the agenda in accordance with the late supplementary information.

### **5 APPLICATION NO. 25/2020/0257/PS - LAND EAST OF LLYN BRENIG, NANT GLYN**

Application withdrawn.

### **6 APPLICATION NO. 47/2020/0216/PF - BRYNLLITHRIG BACH COTTAGE, RHUALLT, ST. ASAPH LL17 0TP**

Councillor Brian Jones declared a prejudicial interest, took no part in the debate and abstained from the vote.

An application was submitted for the siting of a glamping pod for holiday accommodation use at Brynllithrig Bach Cottage, Rhualt, St. Asaph LL17 0TP.

At this juncture, the Development Control Manager clarified that currently technology was not available for a public speaker but a written statement had been provided in favour of the application by Mr and Mrs Edwards. Work was taking place to be able to access technology for public speakers at future meetings.

Written statement provided by Mr and Mrs Edwards (for):

Thank you for the opportunity to take part in this committee. This application is to replace the existing summerhouse situated within the curtilage of the property, with a glamping pod to be used by family and friends as well as holiday accommodation. This application is fully supported by the Offas Dyke Association, the Joint Committee for the Clwydian Range and Dee Valley Area of Natural Beauty as well as several neighbours and members of the community including the land owner to the rear and southern side of the property.

As well as being a space for friends and family to stay, the proposed glamping pod will be a means of income to support Mrs Edwards in reducing her working hours in order to be the main carer for their son who has a very rare, lifelong, severe genetic condition. Both Mr and Mrs Edwards work for the local NHS and have done for in excess of 15 years. Using the proposed glamping pod for holiday accommodation would help to subsidise their income in order to care for their son rather than claiming non-working benefits.

The proposed pod has a rectangular footprint and will be clad externally with red cedar which blends in with the surrounding hillside and dense woodland and has similar weathering characteristics. The domed roof finish is a flat sheet tin; grey in colour to blend with its' surroundings. The development will be sensitive and

unobtrusive and is situated 45 metres from the boundary between Mr and Mrs Edwards' property and the nearest neighbour, Tyddyn Y Drew.

Parking for the one bedroom glamping pod is served by a large car parking area, which is accessed by a short drive along the Cwm Road. Denbighshire highways have expressed no objections to the access.

This is a small-scale development that plans to support the local economy and promote local tourist attractions and businesses for example restaurants, public houses and convenience stores. Mr and Mrs Edwards plan to support other local businesses for example by using a local cleaner and purchasing membership at a local health spa for pod users.

In closing, the application is for a small scale peaceful, holiday accommodation situated next to our family home.

Thank you

Local Member, Councillor Christine Marston confirmed the Community Council had raised no objections to the application.

Councillor Christine Marston **PROPOSED** granting the application in accordance with officer recommendation, **SECONDED** by Councillor Merfyn Parry.

Vote taken: 16 in favour, 0 against, 1 abstention

**RESOLVED** that permission be **GRANTED** in accordance with officer recommendations as detailed within the report and supplementary papers for the siting of a glamping pod for holiday accommodation use.

**7 APPLICATION NO. 02/2020/0251/PC - FORMER WYNNSTAY STORES, PARK ROAD, RUTHIN LL15 1NQ**

An application was submitted for the change of use of buildings and land from A1 Retail to a Builders Yard / B8 Warehouse / Storage Use (retrospective application) at former Wynnstay Stores, Park Road, Ruthin LL15 1NQ.

Local Member, Councillor Emrys Wynne confirmed Ruthin Town Council had not raised any objection to the application. Work had taken place on the site which was now running as a Builders Yard.

It was confirmed that no more than 2 skips would be placed on the site at any one time and would both be placed on the eastern side of the site.

Condition 7 proposed within the Officer report was that there should be no machinery noise prior to 8.00 a.m. It was confirmed that there would be no machinery in place on the site and a request was made for the relevant condition to be removed. The Chair confirmed the condition would be removed.

**PROPOSED** by Councillor Emrys Wynne that the application be granted in accordance with officer recommendation as detailed within the report and subject to the removal of Condition 7, **SECONDED** by Councillor Mark Young.

Vote taken: 17 in favour, 0 against, 0 abstentions

**RESOLVED** that permission be **GRANTED** in accordance with officer recommendation as detailed within the report and supplementary papers and subject to the removal of Condition 7 as no noise generating equipment used on the former Wynnstay Stores site.

**8 APPLICATION NO. 45/2020/0131/PF - OAKTREE CENTRE, CHRISTCHURCH SCHOOL, Ffordd Las, RHYL**

Councillor Tina Jones declared a personal and prejudicial interest.

Councillor Julian Thompson-Hill declared a personal interest.

An application was submitted for the erection of a single storey extension to existing Oaktree Centre to provide additional nursery facilities at the Oaktree Centre, Christchurch School, Ffordd Las, Rhyl.

At this juncture, Councillor Tina Jones left the meeting.

It was questioned why the application had been submitted to Planning Committee. The Development Control Manager confirmed on 24 June, 2020, Councillor Tony Thomas requested the application be submitted to Planning Committee as he had concerns regarding over intensification of the site.

Local Member, Councillor Pete Prendergast explained the nursery was very popular and there was an urgent need to extend. The Oaktree Centre had a number of activities throughout the day and evenings. One objection to the application had been received but did not include planning reasons to the application. The facility was extremely well run and organised and local members were kept fully informed. The support the facility gave to families was immeasurable.

Councillor Tony Thomas requested an independent report showing need for the extension. As the application was a Denbighshire County Council application he felt it should be presented at Planning Committee for public scrutiny and requested all future Denbighshire County Council applications should be put forward before the Planning Committee.

Councillor Mark Young made a point of order at this request.

The Development Control Manager confirmed that the issue of need was not a policy requirement and not a valid reason to refuse this application. He advised Members to disregard this and to restrict the debate to material planning issues. It was also clarified by the Development Manager that there was no reference within the current Scheme of Delegation that all Council applications had to be referred to Planning Committee. Any concerns regarding the operation and management of the

facility could be imposed as a condition. The precise wording of the condition could be agreed with the local members.

**PROPOSED** by Councillor Ellie Chard, that the application be granted in accordance with officer recommendation as detailed within the report and subject to an additional condition requiring an operation/management plan.

Vote taken: 15 in favour, 0 against, 1 abstention

**RESOLVED** that permission be **GRANTED** in accordance with officer recommendation as detailed within the report and supplementary papers and subject to adding an additional condition regarding the operational and management plan of the centre following a discussion with the local member.

**THE MEETING CONCLUDED AT 10:35 A.M.**

This page is intentionally left blank

# Agenda Item 5

**WARD :** Rhyl South West

**WARD MEMBER(S):** Cllr P. Prendergast (c)  
Cllr P. Jones

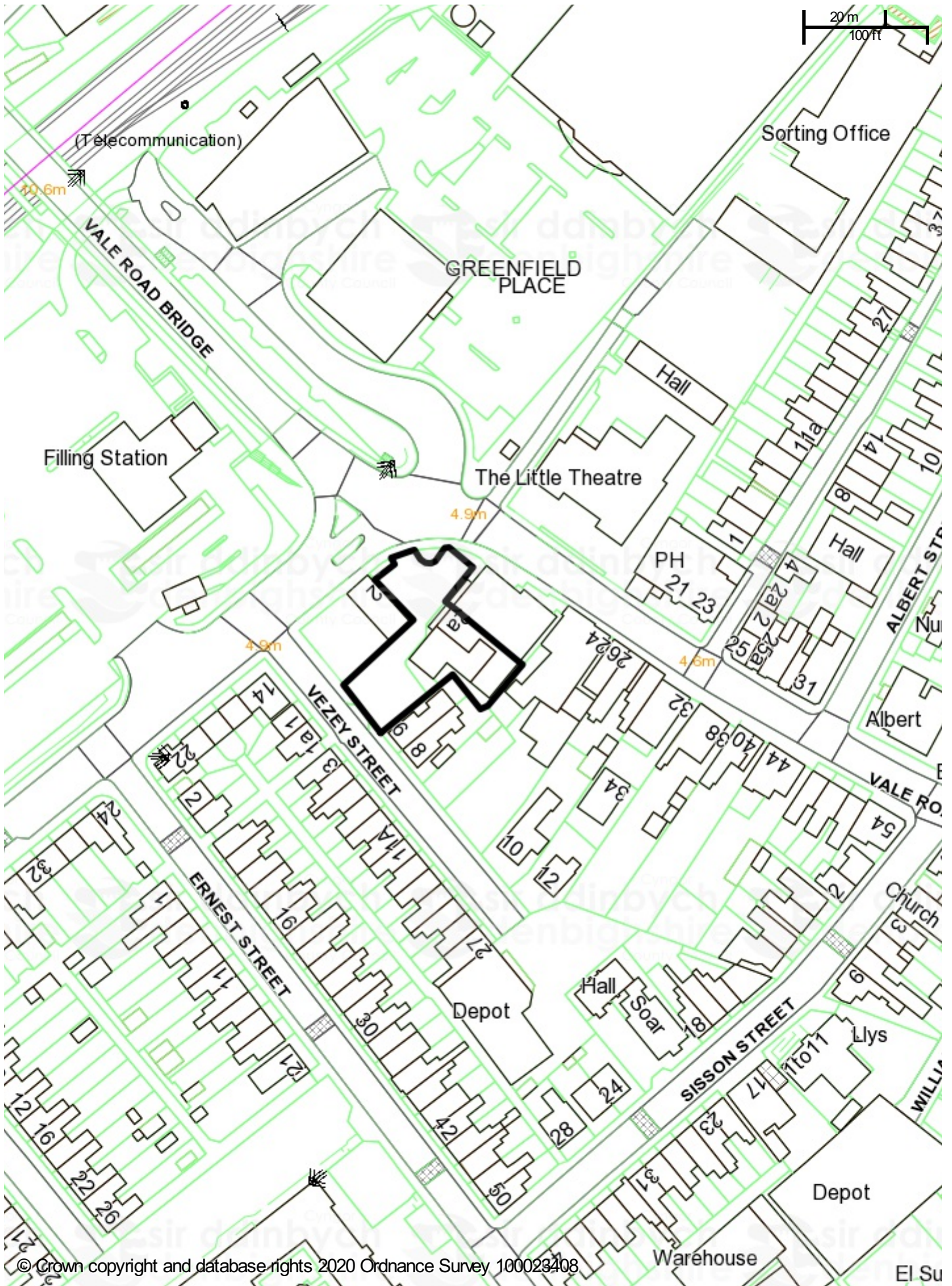
**APPLICATION NO:** 45/2020/0327/ PS

**PROPOSAL:** Variation of condition number 2 of planning permission reference APP/R68301 A/04/1170834 to extend opening hours to 07.00 to 20.00 Monday to Saturday and 09.00 to 17.00 on Sunday

**LOCATION:** Units 2A & 2B 18/20 Vale Road Rhyl LL18 2BU

This page is intentionally left blank





© Crown copyright and database rights 2020 Ordnance Survey 100023408

45/2020/0327

Scale: 1:1250

Printed on: 10/8/2020 at 15:43 PM



The use of this drawing by the recipient acts as an agreement of the following statements:  
 I have read and understand the drawing and the information contained therein. I do not use the drawing and report any discrepancies in writing to Bradley Mason LLP before proceeding.  
 All drawings are based upon site information supplied by third parties/sub contractors and as such their accuracy cannot be guaranteed.  
 All drawings are subject to clarification by a detailed survey, statutory service enquiries and confirmation of the legal boundaries.  
 CHECK ALL DIMENSIONS ON SITE.  
 ALL DIMENSIONS TO BE IN METRIC UNLESS OTHERWISE STATED.  
 USE FIGURED DIMENSIONS IN ALL CASES.

**NOTES:**  
 ALL FIGURED DIMENSIONS MUST BE CHECKED ON SITE PRIOR TO MANUFACTURE OF FITTINGS.  
 ORDERING OF MATERIALS AND EQUIPMENT AND COMMENCING ON SITE.  
 DO NOT SCALE FROM DRAWING.  
 ANY CONFLICTING INFORMATION FOUND ON THE DRAWING MUST BE REPORTED FOR CLARIFICATION.  
 ALL MATERIALS AND WORKMANSHIP TO BE IN ACCORDANCE WITH RELEVANT AND CURRENT BRITISH STANDARDS AND CODES OF PRACTICE.



**Bradley-Mason**  
 project management  
 Windsor House, Cornwall Road,  
 Harrogate, HG1 2PW  
 Tel: 01423 611604  
 www.bradley-mason.com

**PROJECT:**

Site

Block Plan

Toolstation Limited

Unit 2a & 2b,

Bridge Retail Park, Vale Road,

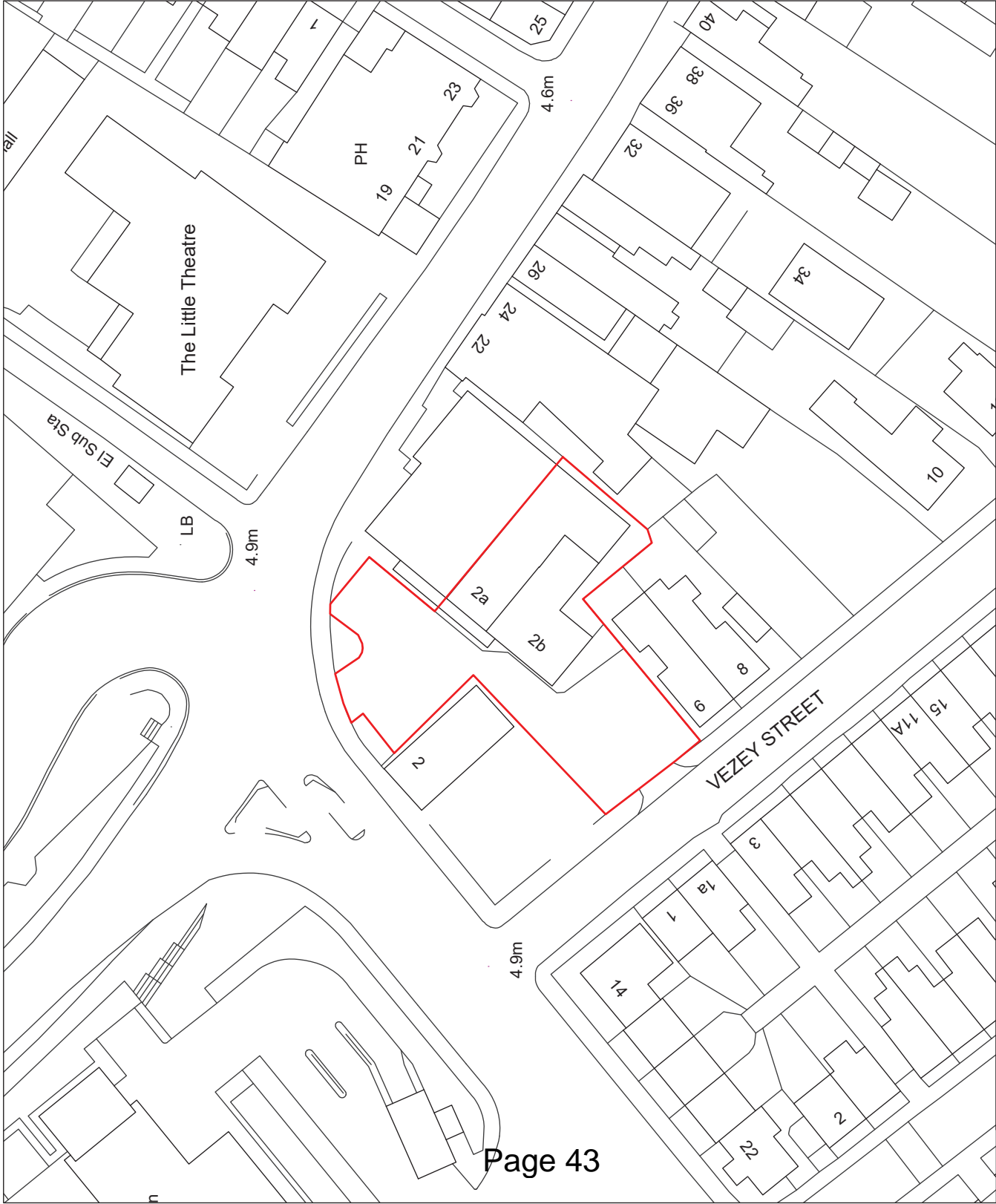
Rhyl LL18 2BU

Rev No.	Revision	Sheet	Date
1	RP	1/1	15.04.20

Drwg No: 1720761/B  
 Rev: -  
 Sheet: 1/1  
 Scale: 1:500 @ A3

Date Drawn: 18.04.20  
 Drawn By: RP  
 Checked By: -

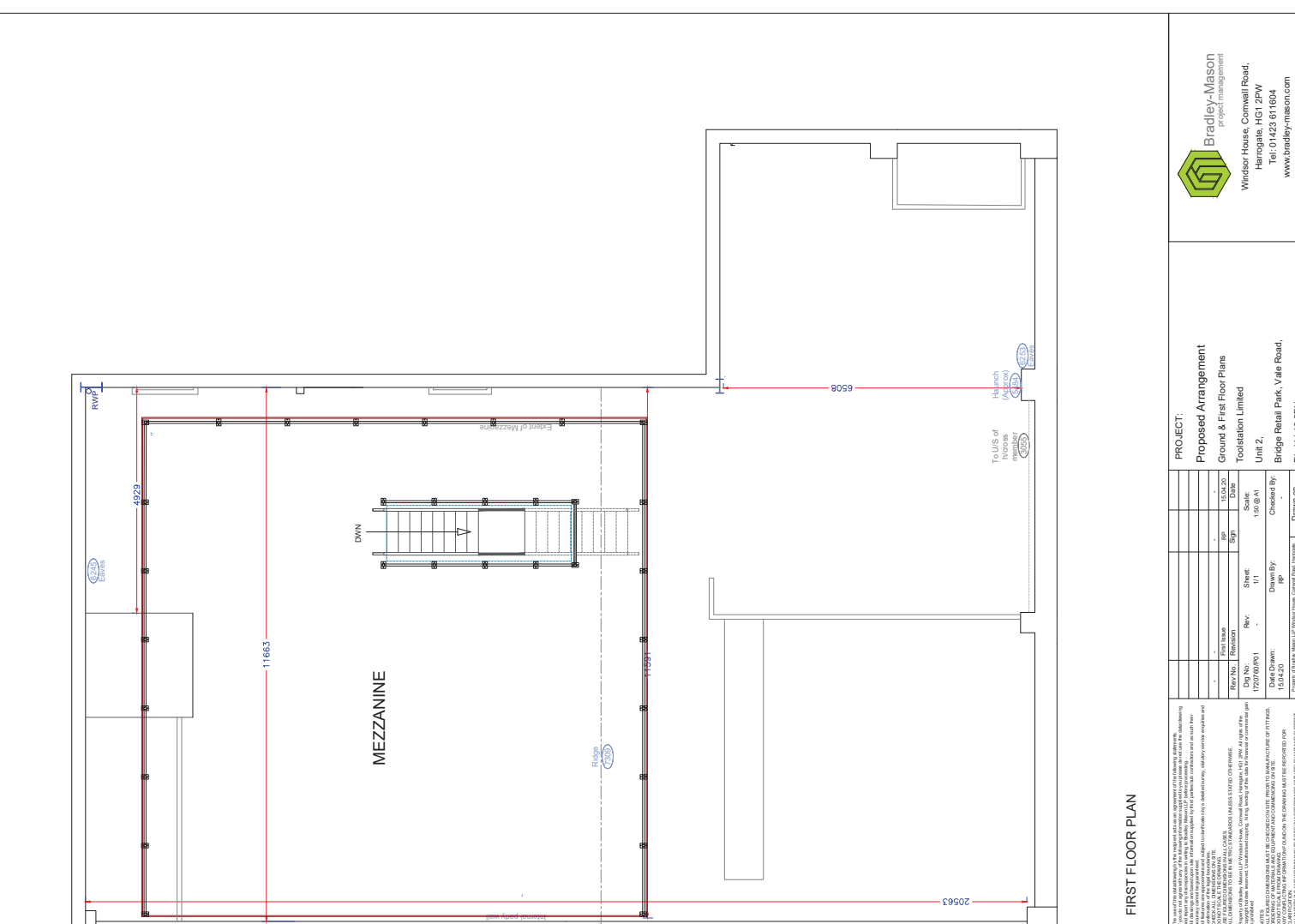
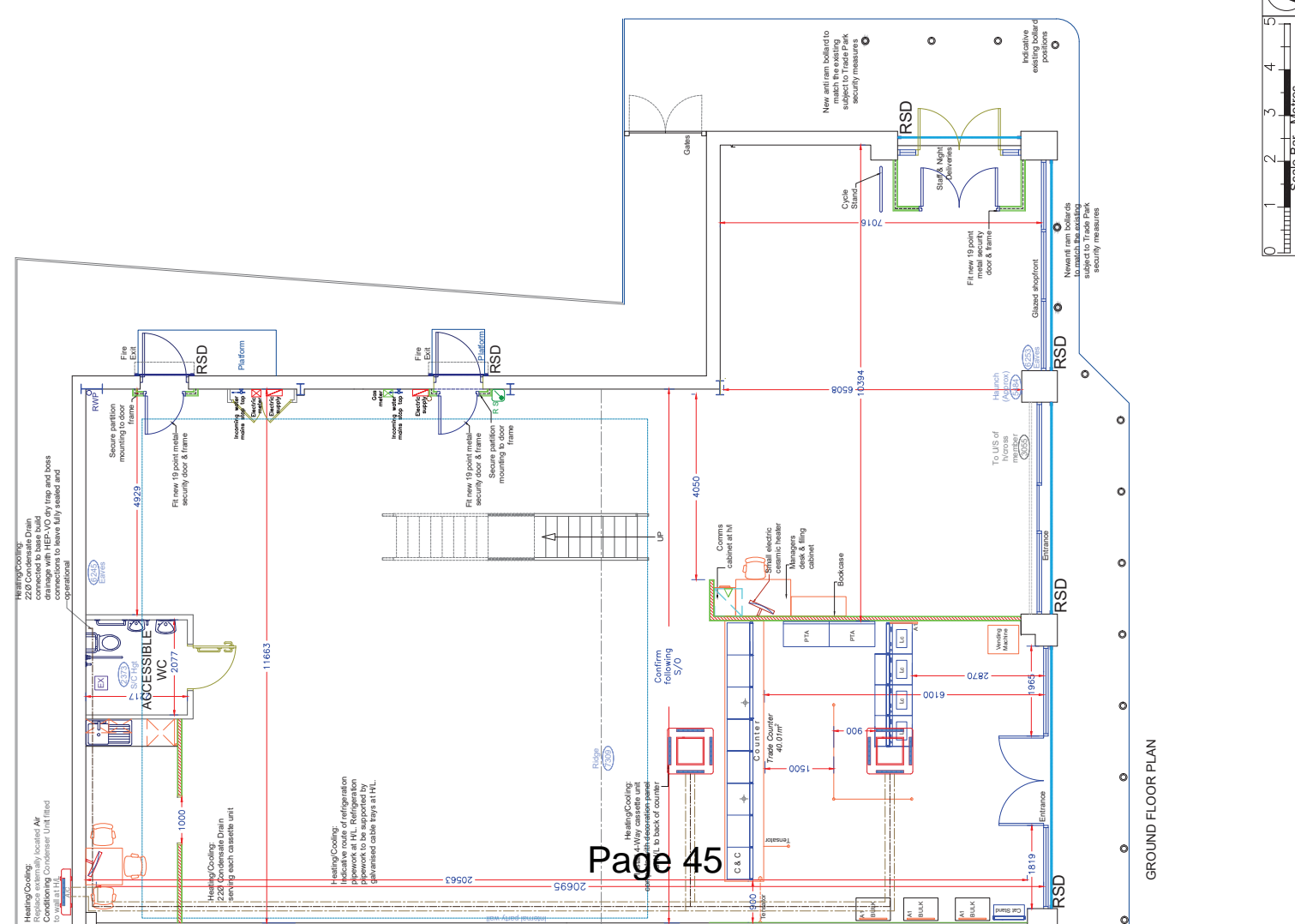
**AUTOCAD 2006**  
 DRAWN ON  
 Property of Bradley Mason LLP Windsor House, Cornwall Road, Harrogate, HG1 2PW. All rights of the copyright holders reserved. Unauthorised copying, printing, scanning or the data for financial or commercial gain is prohibited.



Ordnance Survey, (c) Crown Copyright 2020. All rights reserved. Licence number 100022432







FIRST FLOOR PLAN

GROUND FLOOR PLAN

**BRADLEY-MASON**  
project management  
Harrigale, HG1 2PW  
Tel: 01423 611604  
www.bradley-mason.com

**PROJECT:**  
Proposed Arrangement  
Ground & First Floor Plans  
Toolstation Limited  
Unit 2,  
Bridge Retail Park, Vale Road,  
Ryil LL18 2BU

Rev No.	Description	Date
1	Issue for Tender	15.04.20
2	Issue for Construction	15.04.20

Checked By: 1/1  
Drawn By: 1/1  
Date Drawn: 15/04/20  
Scale: 1:50 @ A1  
Dwg No: 120700/001

Author: [Name]  
Checked: [Name]  
Approved: [Name]

NOTES:  
1. ALL DIMENSIONS TO FACE UNLESS SPECIFIED OTHERWISE.  
2. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
3. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
4. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
5. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
6. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
7. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
8. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
9. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.  
10. ALL DIMENSIONS TO BE METRIC DIMENSIONS UNLESS SPECIFIED OTHERWISE.









**WARD :** Rhyl South West

**WARD MEMBER(S):** Cllr P. Prendergast (c)  
Cllr P. Jones

**APPLICATION NO:** 45/2020/0327/ PS

**PROPOSAL:** Variation of condition number 2 of planning permission reference APP/R68301 A/04/1170834 to extend opening hours to 07.00 to 20.00 Monday to Saturday and 09.00 to 17.00 on Sunday

**LOCATION:** Units 2A & 2B 18/20 Vale Road Rhyl LL18 2BU

**APPLICANT:** Toolstation Ltd

**CONSTRAINTS:** C1 Flood Zone  
Article 4 Direction

**PUBLICITY UNDERTAKEN:** Site Notice - Yes  
Press Notice - No  
Neighbour letters - Yes

**REASON(S) APPLICATION REPORTED TO COMMITTEE:**

**Scheme of Delegation Part 2**

- Recommendation to grant / approve – Town / Community Council objection

**CONSULTATION RESPONSES:**

RHYL TOWN COUNCIL

*“Objection*

*The Town Council are concerned that the variation to extend the opening hours will be detrimental to the residential amenities of neighbouring properties. By its nature the proposed use of the site caters for the building/construction trade who it is likely will seek to visit the site early morning which the Council believe will result in disproportionate disturbance to occupiers of properties in Vezey Street.”*

DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

Highways Officer

No objection

Public Protection Officer

Consider that the opening times proposed by the applicant could adversely impact on the amenity of the neighbouring properties given the proximity of the application site to residential properties.

**RE-CONSULTATION RESPONSES**

RHYL TOWN COUNCIL

*“Objection*

*The Town Council are concerned that the variation to extend the opening hours will be detrimental to the residential amenities of neighbouring properties. By its nature the proposed use of the site caters for the building/construction trade who it is likely will seek to visit the site early morning which the Council believe will result in disproportionate disturbance to occupiers of properties in Vezey Street”*

### Public Protection Officer

Public Protection welcome the initiative of the applicant to attempt to regularise the existing conditions regarding hours of operation at Units 2A & 2B and in conjunction with the planning officer for this case have been willing to enter into negotiations with the agent for the applicant in order to achieve a suitable outcome for the applicant and the residents of Vezey Street, whose amenity will potentially be impacted by the operation of these units at the proposed hours. Attempts have been made to gain agreement on amended hours of operation for Sunday and Bank Holiday hours however these have not been favourably received by the applicant's agent.

Public Protection have conceded to the applicants proposed operating hours on Monday – Saturday and Sunday but remain opposed to the proposed hours of operation for Bank Holidays. Public Protection welcome the proposed delivery plan and the proposed signage contained with the Management & Operational plan.

It should also be noted that the granting of planning permission does not preclude the Public Protection department from carrying out a formal investigation should a complaint of noise nuisance be received.

### **RESPONSE TO PUBLICITY:**

None

### **EXPIRY DATE OF APPLICATION: 2/9/2020**

### **REASONS FOR DELAY IN DECISION: N/A**

### **PLANNING ASSESSMENT:**

#### **1. THE PROPOSAL:**

##### 1.1 Summary of proposals

- 1.1.1 Planning permission is sought for the variation of condition number 2 of planning permission reference APP/R68301 A/04/1170834 to extend opening hours to 07.00 to 20.00 Monday to Saturday and 09.00 to 17.00 on Sunday at Units 2A and 2B at 18/20 Vale Road in Rhyl.
- 1.1.2 'Toolstation' intend to occupy both retail units, which are currently vacant. The application has been submitted to regularise the opening hours across both units, planning permission is not sought for the use as it is not required and falls within a Class A1 retail use.
- 1.1.3 A floor plan has been submitted with the application which shows the main customer access to the building from the existing entrance to Unit 2A (fronting Marsh Road) which is where the trade counter is located. The entrance within the side elevation of Unit 2B and former main entrance to this retail unit, is shown to be a staff and delivery access. The remaining parts of the building are for storage and staff welfare facilities.

##### 1.2 Other relevant information/supporting documents in the application

- 1.2.1 The application is submitted with a covering letter from the applicants agent.

##### The supporting information states:-

*On 4th September 2003 an application (LPA Ref: 45/2003/0678/PF) was granted for the:*

*"Erection of 2no. Retail units, alterations to existing vehicular accesses and formation of parking and turning areas. The decision notice (LPA Ref: 45/2003/0678/PF) is*

enclosed, this development was for the original Unit 1 and 2. Condition 5 of the permission states that:

*"The use of the site shall be restricted to uses falling within Class A1 of the Town and Country Planning (Use Classes) Order, 1987 or any provision equivalent to that Class in any statutory instrument revolving and re-enacting that Order with or without permission."*

*There were no operational hours restrictions within the consent. Following this, an application was refused by the LPA on 24th November 2004 for the: "Change of use and subdivision of Unit 2 to part Class A1 retail and part Class A3 (pizza takeaway)."*

*However, an appeal (Ref: APP/R68301/A/04/1170834) of this decision was allowed on 6<sup>th</sup> April 2005, the appeal decision is enclosed. Condition 2 of the appeal decision states that:*

*"The use as a take-away hereby permitted shall not be open to customers outside the following times: 09.00 hours and 22.00 hours on any day."*

*This approval created Unit 2a and 2b. The lawful use of Unit 2a was Class A1 and Unit 2b was Class A3 at the time. It is clear that since this consent, Pets First have previously utilised permitted development rights from Class A3 to Class A1 to operate from the unit. We now consider the lawful use of Units 2a and 2b as being Class A1. However, as the previous occupier has utilised permitted development rights, any operational conditions included within the Class A3 permission must be repeated for any subsequent Class A1 use.*

*Therefore, at the moment Unit 2a has no operating hours restrictions and Unit 2b is restricted as per Condition 2 of the appeal decision.*

*Toolstation are seeking to occupy both units and operate these as a 'Toolstation Metro' unit, to achieve their required opening hours across both units, we are submitting a variation of Condition 2 application.*

*The application proposal is to vary the wording of Condition 2 of appeal decision APP/R68301A/04/1170834 to read:*

*"The use as a retail unit shall not open to customers outside the following times 07:00 to 20:00 hours any day."*

*The proposed new wording of this condition will provide further clarity on the permitted opening hours of both units. These proposed new operating hours are only 2 additional hours on weekday mornings with 2 less hours in the evening. The proposed opening hours are as follows:*

- Monday to Saturday (Including Bank Holidays) 07:00 to 20:00; and*
- Sundays 09:00 to 17:00.*

*There is proposed to be one delivery anytime per day. Car parking and loading locations are as existing.*

*Toolstation Ltd is a UK wide subsidiary of Travis Perkins plc with 400 outlets across the UK. It specialises in the sale of power tools and accessories, hand tools, screws and fixings, decorating materials, plumbing/heating and electrical supplies, work clothing and other products associated with building/DIY. Each unit stocks approximately 10,000 catalogue products and serves predominantly the building industry, although Toolstation do accept trade from private customers.*

*Toolstation's format usually comprises a Class B8 trade counter, and is therefore typically located on industrial estates. However, to meet the growing demand by private customers and small businesses for its goods, it has designed a new high street format called 'Toolstation Metro'. This format has already opened at numerous locations across the UK, however this unit will be the first of this type in Wales.*

*In addition to the catalogue sales, there will be a range of point of sale/promotional and pick up goods from right across the full product range on sale in the customer area. This range will be updated regularly in response to consumer demand. Whilst still 'bulky' in its nature, this new format requires a Class A1 permission. This complies with the current Class A1 permission at this unit.*

*In conclusion, the submitted information demonstrates that the slight extension of opening hours at the proposed Toolstation Metro unit, Unit 2a/b Vale Road, Rhyl is appropriate at this location. Therefore, in this case, the application to vary Condition 2 of appeal decision APP/R6830/A/04/1170834 should be supported.*

A Management and Operational Plan has also been submitted with the application.

The main points are:

1. There is proposed to be a maximum of 1 delivery any day between 1000 to 2100 from Monday to Saturday.
2. Signage will be visible outside and within the premises, requesting noise to be kept to a minimum and encourage customers to only park in the Vezey Street parking area if there are no spaces available in the parking area to the front of the unit. The signage will also include a contact number for residents to use if they are affected by any unreasonable disturbance.
3. During deliveries, staff to keep noise to a minimum and follow the following management measures:
  - Goods pallets or cages are wheeled directly into the building via the shortest route available.
  - The delivery vehicle generally parks with the tailgate as close to the entrance doors as practicable;
  - Delivery vehicle engines are switched off as soon as the vehicle is parked at the unloading position and not restarted until the vehicle is ready to depart;
  - Delivery vehicles are required to be driven in as quiet a manner as possible, avoiding unnecessary engine revving and, in the case of reversing alarms, as little reversing as possible; and
  - Staff are instructed to work quietly when outside the building.
- Customers only have access to the Sales Counter area from the entrance to Unit 2A fronting Marsh Road.

A subsequent letter has been received from Legat Owen (Chartered Surveyors) on behalf of the owner of the building.

The supporting information states as follows:

*I write as the landlords letting agent in respect of the above mentioned site to provide some background information in respect of marketing the premises to date to assist with the determination of the planning application submitted by our proposed tenants, Toolstation.*

*Legat Owen were appointed by the landlord in March 2018 to assist with marketing the property pending the expiry of the Pet store in August 2018. As of March 2018, they had not been in occupation for quite some time prior to this.*

*We undertook a formal and wide-ranging marketing campaign on the vacant property which included marketing boards on site, circulation of marketing particulars, listings on Zoopla, CoStar and Realla (amongst others) together with a targeted campaign towards occupiers that may have a requirement for accommodation in the area. A*

*copy of our marketing particulars is attached to this report.*

*Over the last two and a half years, we had no viable interest in taking a lease on the premises with only one viewing undertaken on the property during this period (Prior to Toolstation), but unfortunately given the configuration of the property it was not suitable for that particular tenant.*

*In March this year, Carphone Warehouse announced the closure of all the standalone stores across the country, including this site. This has led the landlord to having 50% of the scheme vacant together with the loss to the town of a number of jobs where there is already an increasing rate of retail casualties and a significant number of vacant retail outlets.*

*Following the announcement of this closure, we were able to agree terms with Toolstation for a new lease of the whole premises, the first serious interest we have had in over two years of marketing.*

*The proposal from Toolstation will secure an occupier for the gateway building for a period of 10 years and the proposal will result initially in the creation of between 5 and 8 full time equivalent jobs, the majority of which we anticipate will be recruited locally.*

*The adjoining building which was previously occupied by Johnson dry cleaners has been closed and vacant since Johnson is vacated in 2015. Given the increasing number of voids on the park, this has led to an increase in fly tipping and antisocial behaviour.*

*As I'm sure you can appreciate (particularly now given the impact of Covid 19) retail is challenging in the current climate and anything local authorities can do to help support landlords and tenants (such as supporting minor planning applications) will go a long way to help the recovery of town centres. Given the significant length of time the premises have been vacant, we would have anticipated the local planning authority to be able to conclude quickly the proposal will only have a positive impact on the vitality and viability of Rhyl.*

*It is our professional opinion a planning refusal would leave both premises vacant for the foreseeable future.*

### 1.3 Description of site and surroundings

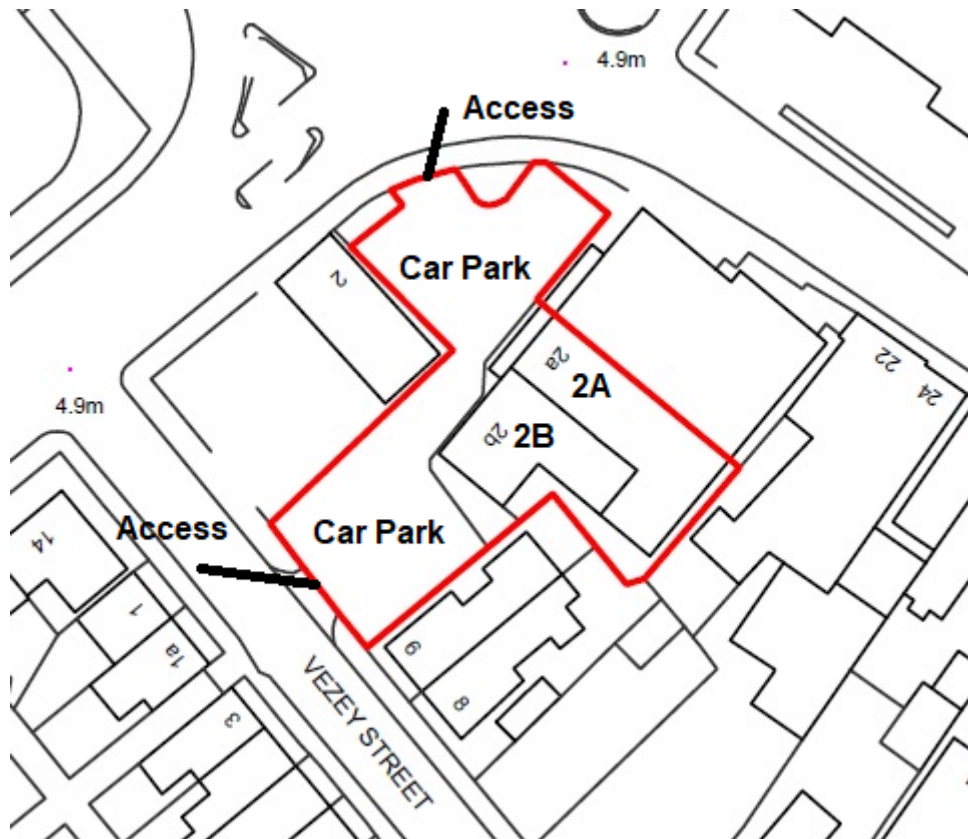
- 1.3.1 The application site occupies a small retail terrace located on the corner of Vale Road with Marsh Road in Rhyl.
- 1.3.2 The units have an access off the signalled junction on the corner of Vale Road with Marsh Road and also off Vezey Street, with access to 2 car parking areas.
- 1.3.3 Opposite the site on Marsh Road is the 'Morrisons' store and petrol station, adjoining the site is Unit 1 which is in use by 'Barnardos' with Vale Road and 'The Little Theatre' opposite along with numerous commercial properties fronting Vale Road on both sides. To the south and western boundary are residential properties on Vezey Street.
- 1.3.4 To the front of the unit is a small detached retail unit previously occupied by 'Johnsons Dry Cleaners' which is also vacant.
- 1.3.5 Photographs and an illustrated site plan have been included below:



Units 2A and 2B



Relationship with residential properties on Vezey Street



Site arrangements

1.4 Relevant planning constraints/considerations

- 1.4.1 The site is located within the development boundary of Rhyl. The site is located on the outside edge, but close to the Town Centre Boundary of Rhyl (Policy PSE 8).

1.5 Relevant planning history

- 1.5.1 Planning permission for the erection of 2 no. units was granted in 2003. This planning permission placed no operational restrictions, such as hours opening or delivery restrictions on the retail units.
- 1.5.2 In 2004, planning permission was granted on appeal for the change of use and subdivision of Unit 2 to part Class A1 retail and part Class A3 (pizza take-away) with a condition (no 2) allowing opening hours from 9am to 10pm every day.
- 1.5.3 In 2005 planning permission was granted for the installation of a new shop front and variation to condition No.2 to planning permission 45/2004/1248/PF to allow increase in hours of operation of class A3 takeaway from 22.00 hours closing to 23.00 hours closing.
- 1.5.4 The planning permission was implemented and the unit sub-divided in to Units 2A and 2B, however the Class A3 pizza take away use is understood to have fallen through. A Pet Shop business occupied the site until 2017/2018.

1.6 Developments/changes since the original submission

1.6.1 Discussions around the opening hours have taken place with the applicant's agent and the Councils Pollution Control Officer.

1.6.2 A Management and Operational Plan for the site has been submitted as part of the application which sets out detailed management arrangements for the site.

1.7 Other relevant background information

1.7.1 None

**2. DETAILS OF PLANNING HISTORY:**

2.1 45/2003/0678/PF Erection of 2 No. retail units, alterations to existing vehicular accesses and formation of parking and turning areas GRANTED 15<sup>th</sup> August 2003.

45/2004/1248/PF Change of use and subdivision of Unit 2 to part Class A1 retail and part Class A3 (pizza take-away) REFUSED 5<sup>th</sup> November, 2004.

ALLOWED on Appeal Decision letter dated 6<sup>th</sup> April 2004 subject to the following condition:

*Condition 2: The use as take away hereby permitted shall not be open to customers outside the following times: 09:00hours and 22:00hours on any day.*

45/2005/0687/PF Installation of new shop front and variation to condition No.2 to planning permission 45/2004/1248/PF to allow increase in hours of operation of class A3 takeaway from 22.00 hours closing to 23.00 hours closing GRANTED 29<sup>th</sup> October, 2005.

**3. RELEVANT POLICIES AND GUIDANCE:**

The main planning policies and guidance are considered to be:

3.1 **Local Policy/Guidance**

Denbighshire Local Development Plan (adopted 4<sup>th</sup> June 2013)

**Policy RD1** – Sustainable development and good standard design

3.2 **Government Policy / Guidance**

Planning Policy Wales (Edition 10) December 2018

Development Control Manual November 2016

Technical Advice Notes

TAN 4 Retail and Commercial Development (2016)

Circulars

3.3 **Other material considerations**

**4. MAIN PLANNING CONSIDERATIONS:**

In terms of general guidance on matters relevant to the consideration of a planning application, Section 9.1.2 of the Development Management Manual (DMM) confirms the requirement that planning applications 'must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. It advises that material considerations must be relevant to the regulation of the development and use of land in the public interest, and fairly and reasonably relate to the development concerned.

The DMM further states that material considerations can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment (Section 9.4).



The DMM has to be considered in conjunction with Planning Policy Wales, Edition 10 (December 2018) and other relevant legislation.

The following paragraphs in Section 4 of the report therefore refer to the policies of the Denbighshire Local Development Plan, and to the material planning considerations which are considered to be of relevance to the proposal.

4.1 The main land use planning issues in relation to the application are considered to be:

4.1.1 Residential amenity

4.2 In relation to the main planning considerations:

4.2.1 Residential amenity

Local Development Plan Policy RD 1 test (i) requires due regard to issues of siting, layout, form, character, design, materials, aspect, microclimate and intensity of use of land / buildings and spaces between buildings, which touch on the potential for impact on residential amenity; test (vi) sets the requirement to assess the impact of development on the amenities of local residents, other land and property users, or characteristics of the locality, in terms of increased activity, disturbance, noise, dust, fumes, litter, drainage, light pollution, etc..

Planning Policy Wales 3.1.4 confirms that factors to be taken into account in making planning decisions (material considerations) must be planning matters; that is, they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability. The residential amenity impacts of a development proposal are a material consideration.

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The residential amenity impacts of development should therefore be regarded as a potential material consideration.

No representations have been received from local residents however Rhyl Town Council have raised concerns relating to the nature of the use and the impact the early hours proposed would have on amenities of nearby residents.

The proposal seeks to regularise the opening hours at Units 2A and 2B which is intended for use by 'Toolstation'. Currently the units have no/differing restrictions in place and it is considered reasonable for a new occupier to seek approval of the same hours across both units. The hours proposed are 07.00 to 20.00 Monday to Saturday and 09.00 to 17.00 on Sunday.

Unit 2A (central unit) was granted permission in 2003 with no operational hours/restrictions placed on the use at all. Until recently the unit was occupied by Carphone Warehouse however due to nationwide closures the unit was closed and remained vacant since early 2020.

Unit 2B (end unit, former Pet Shop) was granted consent in 2004 with operational restrictions of 9am to 10pm (every day) placed on the Class A3 use. A further amendment to the closing time to 11pm (every day) was also granted in 2005. Whilst a Class A3 use hasn't operated, permitted development rights allowed the store to operate as a Class A1 retail use and any operational conditions included within the Class A3 permission is repeated.

The Council's Public Protection Officer has raised no objection to the proposed hours Monday to Saturday however has expressed concern in relation to the Sunday and Bank Holiday hours, which it is intended would be the same standard hours

dependent on the day the bank holiday falls, on the amenity of local residents on Vezey Street.

In discussions with the applicants agent, the applicant's agent has confirmed the hours proposed are what 'Toolstation' require to operate effectively and which are standard operating hours for all of their units across the UK. Whilst the Sunday and Bank Holiday hours have not been amended, a Management and Operational Plan has been submitted which seeks to address concerns relating to deliveries and activities that could potentially be harmful to local residents on Vezey Street.

Officers welcome the submission of a Management and Operational Plan as currently these are not in place in any form for either Unit 2A or 2B. The measures within the Plan are considered acceptable and address operational issues that have the potential to impact on the amenities of local residents on Vezey Street.

In relation to the proposed hours and concerns of the Town Council, it is acknowledged that the properties on Vezey Street are in close proximity to the units and parking area. However, the planning history and current operational controls in place have to be considered - Unit 2A has no controls on opening hours or deliveries at all and could operate 24hours every day; Unit 2B could open from 9am to 11pm every day with no controls on deliveries.

Approval of the application would provide controls on Unit 2A and in terms of Unit 2B, overall the opening hours proposed would be less than currently approved. It is acknowledged that the hours proposed would allow Unit 2B to open 2hours earlier in the morning than the current approved hours, however a Management and Operational Plan has been submitted which contains a number of mitigation measures, which if the application is approved, would be enforceable. In relation to the Sunday/Bank Holiday hours, as referred to above, the hours proposed are an improvement to the controls currently in place.

In relation to noise, it should also be noted that the granting of planning permission does not preclude the Public Protection department from carrying out a formal investigation should a complaint of noise nuisance be received.

Furthermore, both retail units are vacant, with Unit 2B having been vacant for over 2 years. The detached unit to the front of the units (formerly 'Johnsons') has also been vacant for 5 years and there was evidence of fly tipping observed when the site visit was undertaken. The proposal would not only secure a beneficial, economic re-use for these vacant units but also secure the investment of a major UK wide company in Rhyl and create between 5 and 8 full time jobs.

Having regard to all of the above considerations, the proposal is considered acceptable and would not result in a significant adverse impact on the amenities of local residents.

#### Other matters

##### Well – being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on the Council not only to carry out sustainable development, but also to take reasonable steps in exercising its functions to meet its sustainable development (or well-being) objectives. The Act sets a requirement to demonstrate in relation to each application determined, how the development complies with the Act.

The report on this application has taken into account the requirements of Section 3 'Well-being duties on public bodies' and Section 5 'The Sustainable Development Principles' of the Well-being of Future Generations (Wales) Act 2015. The recommendation is made in accordance with the Act's sustainable development

principle through its contribution towards Welsh Governments well-being objective of supporting safe, cohesive and resilient communities. It is therefore considered that there would be no significant or unacceptable impact upon the achievement of well-being objectives as a result of the proposed recommendation.

**5. SUMMARY AND CONCLUSIONS:**

5.1 The proposed opening hours are considered acceptable and the proposal is recommended for approval.

**RECOMMENDATION: APPROVE-** subject to the following conditions:-

1. The development hereby permitted shall be carried out in strict accordance with details shown on the following submitted plans and documents unless specified as otherwise within any other condition pursuant to this permission;
  - i) Existing arrangements/ground floor plan (Drawing No 1720761/E01 PSO) received 27 April 2020
  - ii) Block Plan (Drawing No 1720761/B) received 27 April 2020
  - iii) Proposed Floor Plan (Drawing No 1720761/P01) received 27 April 2020
  - iv) Location Plan (Drawing No. 172076-LP) - Received 27 April 2020
  - v) Management and Operational Plan received 21 July 2020

The reasons for the conditions are:-

1. For the avoidance of doubt and to ensure a satisfactory standard of development.

This page is intentionally left blank

# Agenda Item 6

**WARD :** Tremeirchion

**WARD MEMBERS:** Cllr Christine Marston (c)

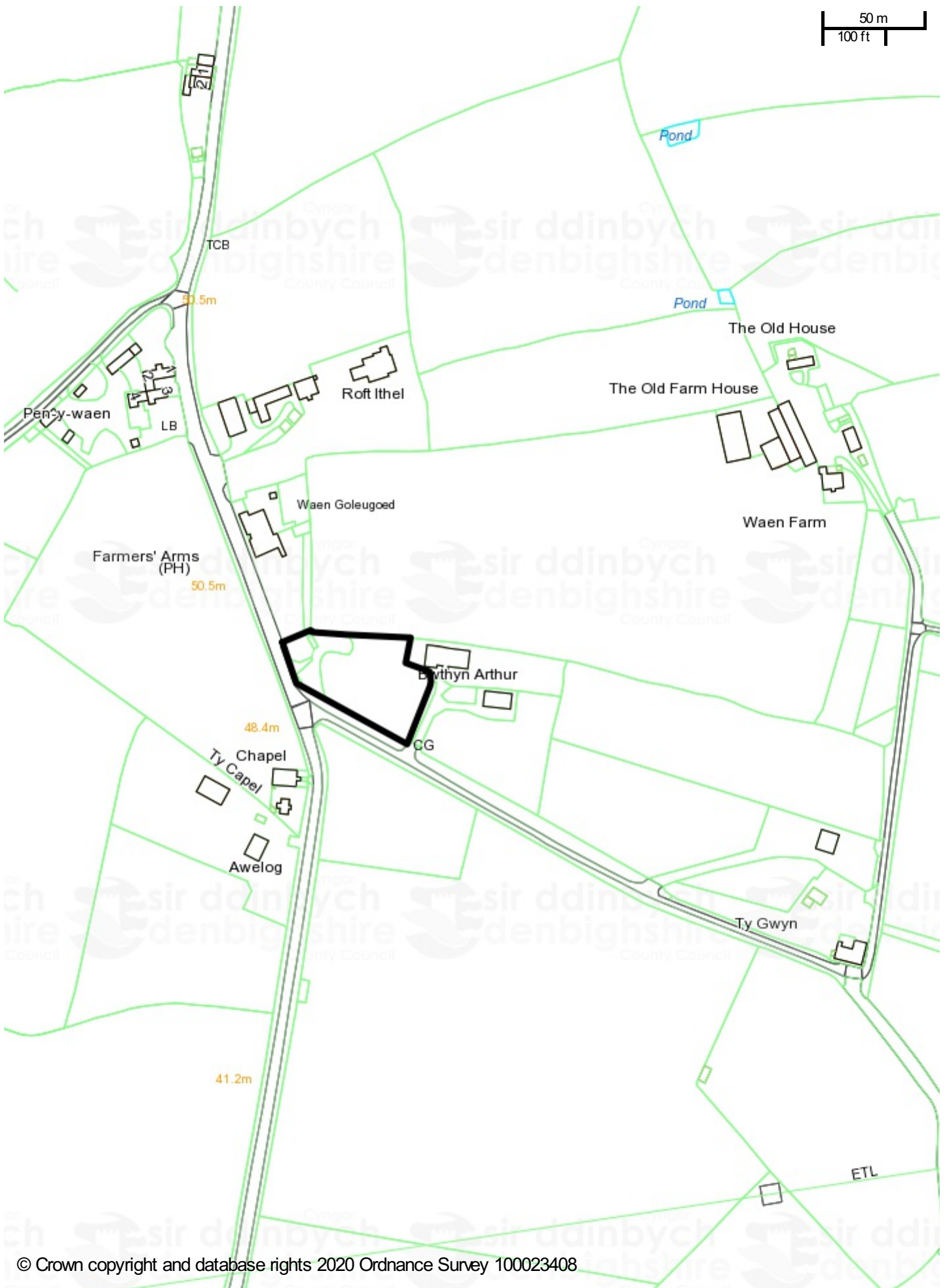
**APPLICATION NO:** 47/2020/0237/ PF

**PROPOSAL:** Operational development required in association with use of land as a caravan and motorhome club certified location / exempted caravan site comprising formation of a vehicular access, internal access tracks and hardstanding areas, drinking water tap, electricity hook up points, chemical toilet waste disposal facility with rinsing tap, wildlife pond and landscaping (partly retrospective)

**LOCATION:** Land Adjacent to Farmers Arms Waen Llanelwy LL17 0DY

This page is intentionally left blank

50 m  
100 ft



© Crown copyright and database rights 2020 Ordnance Survey 100023408

47/2020/0237

Scale: 1:2500

Printed on: 10/8/2020 at 15:48 PM









Fig ①

# Electric Hook up POINTS

13 MAR 2020



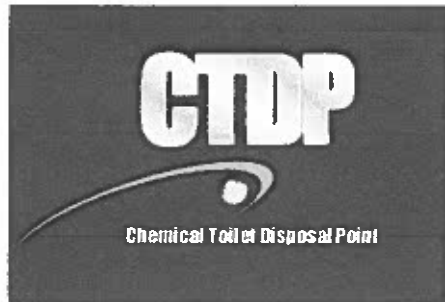


13 MAR 2020

Fig B

12/03/2020

<https://ctdp.co.uk>



Pay by Bank Transfer or Cheque  
and get a 3% Discount

**01460 240069**

**[jason@grpmouldingsuk.com](mailto:jason@grpmouldingsuk.com)**

[Home](#) [Price/Purchase](#) [Specification](#) [Contact Us](#) [GRP Mouldings](#)

Welcome

Hi Jason,

We would like to order  
another flushing unit  
for one of our other  
parks please

We are very impressed  
with the unit we

bought and have received  
great feedback from our  
customers

Paul Swalwell

[www.swalwellholidaygroup.co.uk/](http://www.swalwellholidaygroup.co.uk/)



## Chemical Toilet Disposal Units

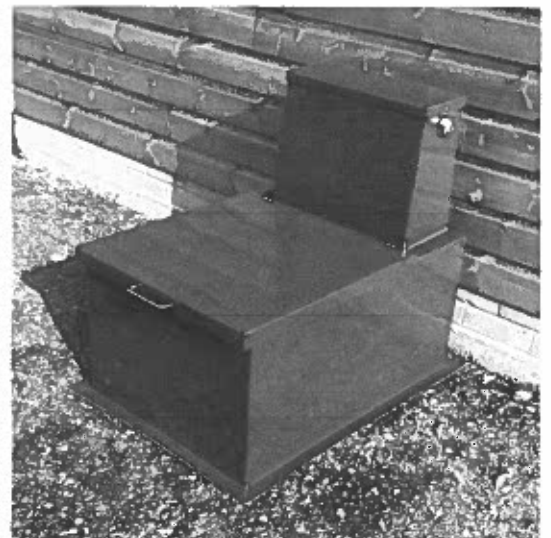
Stand Alone Chemical Toilet Disposal Units

(Also known as Elsan Tipping Points)

for emptying portable toilet cassettes

with or without built in flush.

Installed across the UK and Europe for over 10 years



Page 69

£320+vat

£680+vat

"Dear Jason

As you know we have 3 of



**WARD :** Tremeirchion

**WARD MEMBERS:** Cllr Christine Marston (c)

**APPLICATION NO:** 47/2020/0237/ PF

**PROPOSAL:** Operational development required in association with use of land as a caravan and motorhome club certified location / exempted caravan site comprising formation of a vehicular access, internal access tracks and hardstanding areas, drinking water tap, electricity hook up points, chemical toilet waste disposal facility with rinsing tap, wildlife pond and landscaping (partly retrospective)

**LOCATION:** Land Adjacent to Farmers Arms Waen Llanelwy LL17 0DY

**APPLICANT:** Mr / Mrs Peter & Elaine Maull / Molloy

**CONSTRAINTS:** None

**PUBLICITY UNDERTAKEN:** Site Notice - Yes  
Press Notice - No  
Neighbour letters - Yes

**REASON(S) APPLICATION REPORTED TO COMMITTEE:**

**Scheme of Delegation Part 2**

- Recommendation to grant / approve – 4 or more objections received
- Recommendation to grant / approve – Town / Community Council objection

**CONSULTATION RESPONSES:**

TREMEIRCHION, CWM & WAEN COMMUNITY COUNCIL

Object.

- 1) The site is situated on a busy 60mph road. Concerns re: highways safety for towing vehicles and other road users. The 60mph speed limit has been discussed at council meetings in the past
- 2) The Health and Safety Executive stipulated and recommended that each caravan should have a minimum of 3 metres clear distance between it and the next caravan to ensure a safe distance in case of fire. Also, cars belonging to the caravan owners should be parked so as to ensure that the vehicle cannot "runaway" towards and collide with other caravan owners, caravans and or the caravan awnings. As this site is small those conditions may not be possible.
- 3) The site is agricultural in nature and should this application be granted the site will have a detrimental effect on the properties in that locality, particularly the private residence situated next to the site. Concerns include noise pollution from the site and how this would impact on the lives and enjoyment of the home owners and residents in the vicinity.
- 4) There are already several sites, suitable for touring caravans and motor homes in the locality and there is no demand or need for an additional site of this nature. Permitting another caravan site here could be detrimental to the neighbourhood.
- 5) There is high local opposition
- 6) Over-development of a small site.
- 7) The development adjoins and overlooks a residence.
- 8) It is retrospective and all works including extensive groundwork commenced without permission. This sets a precedence for future applications.

NATURAL RESOURCES WALES – No objection, NRW have provided advice to applicant regarding foul drainage and chemical toilet disposal.

DWR CYMRU / WELSH WATER – Note foul water would not connect to the mains drains and therefore no comments provided.

SP ENERGY NETWORKS (on behalf of SP MANWEB electricity distribution network operator)  
- SP Manweb have advised they have assets across the site (overhead lines and substation) which may present a risk to users of the caravan site.

SP Energy Networks, on behalf of SP Manweb, has a statutory duty to maintain electrical safety clearances around existing overhead lines, which may require felling and tree lopping. As such, any proposed landscaping in proximity to an existing line should consider the need for such works as the landscaping matures. SP Manweb would suggest only low growing shrubs be planted below overhead lines to prevent the need for lopping in the future.

DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

- Traffic, Parking and Road Safety
- Highways Officer

*Original consultation response:*

Highways Officers initially requested additional information to demonstrate that touring vehicles could safely enter and leave the site from the highway, and manoeuvre within the site to park, should the carpark be fully occupied.

Whilst acknowledging the access and existing visibility is already established, Highways Officers also requested additional information to demonstrate there is adequate visibility for a touring caravan and vehicle to access / exit the site.

Visibility splays and a swept path analysis were therefore requested.

*Re-consultation response:*

Highways Officers have recognised the number of objections on highway grounds, and comments are provided in response to the operational aspect in terms of highway element arising from the proposals and not the use of the land.

The site accessed from the public highway using the existing public house car park to the adjoining field where the caravans will be sited. The proposal does not involve a new access onto the highway. The public highway is a rural road used by a large number of agricultural vehicles accessing the surrounding land and as such the caravan towing vehicle is of similar size to the modern farming vehicles currently using this road.

Additional information was requested to ensure that this existing access could operate and be accessed and egressed safely to and from the site by such vehicles. The submitted swept path analysis demonstrates that a 4 x 4 vehicle + twin axle caravan can undertake this manoeuvre safely.

The visibility splays provided that at the point of access to the highway 102m to the South and 106m to the North can be achieved. In accordance with TAN 18, 120m on new developments should be provided.

Although there is a shortfall in standards, TAN 18 states that although the visibility splays provided are below standard and where planning applications are submitted within an existing development site and served by an existing substandard access, there should be scope for limited redevelopment that incorporates a substantial access improvement, even though the improved access would still be below standard.



Highways Officers note the gates have been re-sited further within the site which provides a splayed entrance which is deemed a safer means of access and an improvement on the former open arrangement and therefore demonstrates compliance with the visibility standards set out in TAN 18 Table B. and therefore considered to be acceptable

Highways Officers note that a similar application was granted under Code 47/2017/0792 at Waen Chapel for the formation of a car park and construction of means of access where the visibility splays did not meet standards but consideration was given to the guidelines laid out in TAN 18, as mentioned above.

It is noted that two parking bays intrude about 400mm in the visibility splay to the East, yet, this would not be large enough to fully obscure a whole vehicle and the overall envelope of visibility and therefore Highway Officers consider this will not have an impact on road safety. As seen on the swept path drawing, the turning circles are well clear of the parking bays.

There have been no reported accidents in the last five years and given the restricted use of this small scale development and the submitted details, Highways Officers do not foresee any highway related issues arising from the development and therefore have no objection to the proposals.

County Ecologist – No comments received.

Flood Risk Engineer - the proposal will need SAB approval. However, in making its decision the SAB will take account of any local knowledge or concerns regarding drainage.

## **RESPONSE TO PUBLICITY:**

### In objection

Representations received from:

Ian M Jarvis & Emma E Bateman, Glanrafon, Waen  
Mr & Mrs Seaman, The Gatehouse, Waen  
John Piper, 1 Bryn Ibod, Waen  
R & C Peacock, Bwthyn Arthur, Waen, St. Asaph  
S. & D. Jones, Waen Farm, St. Asaph  
Dr & Mrs Day, Castell, Waen, St Asaph  
Katherine Sanders, Pen y Banc, Waen  
Martin and Gemma Sivill, Plas Coch, Tremeirchion  
Geoff Roberts, Vale Cottage, Waen, St. Asaph  
John and Margaret Carter, Ysgol Isaf, Waen  
Rhodri O Roberts, Ty Gwyn Waen  
Bob & Beryl Davies, Glan Clwyd Waen.  
J & N Lighbown, Fachwen Farm, Waen  
K and A Burgoyne, 1 Salisbury Villas, Waen  
Colin Simpson, Highway Panning Service (on behalf of local residents)

Summary of planning based representations in objection:

Principle:

- Objects to principle of caravan site in this location / no need for additional caravan sites in this area.
- Operational works carried out exceed the minimal works required for a Certified Location caravan site.
- Object to the retrospective application / should have obtained planning consent prior to carrying out works.
- Not a sustainable location / poor accessibility by public transport, cycling or on foot, no local shops – development would be dependent on cars.
- Does not demonstrate how the proposal would contribute to the local rural economy.
- Loss of agricultural land.

Visual amenity:

- Works carried out are excessive in scale, and detrimental to visual amenity / character of the local rural area.
- Site is not well screened.
- Planting does not provide sufficient screening of the site.
- Excessive amount of hardstanding / tracks

Residential amenity:

- Pitches too close to neighbouring property.
- Would detrimentally impact on privacy and outlook of neighbouring property and cause noise & disturbance.

Access / Highways:

- Site is not on B5429 but on the Bod Ifan junction to A55 which is a heavily used unclassified road & road has been narrowed recently. Development would increase traffic along this unsuitable road resulting in highway safety issues.
- Existing access is close to bend in road and close to junction with unclassified road with poor visibility – slow moving caravans would not be able to access / exit site onto road safely.
- No footpaths along public roads.
- Inadequate visibility into and out of site for caravans and therefore would increase risk of collisions.
- Road traffic speed referred not available to verify.
- TAN18 visibility splays cannot be achieved and insufficient space for passing vehicles to access / egress site at the same time as a caravan.
- proposed development would result in an intensification of the use of the access and the use by longer and less manoeuvrable vehicles than those generally accessing a pub car park.

Drainage / flooding

- No surface water drainage details provided.
- Additional runoff from hardstanding proposed may increase risk of flooding to surrounding land.
- Grey water is often visible in ditches to north and east of site (consider this could be discharge from existing septic tank) – ditches discharge into river.
- Chemical toilet disposals should not discharge into septic tanks.

Ecology:

- Planting proposed includes non-native species.
- No ecology assessment submitted / site may support protected species.

Other:

Concerns have been raised in public responses regarding the adequacy of the Caravan and Motorhome Club consultation in respect of the licensing of the site. Officers consider that these comments relate to separate non-planning legislation and are therefore not material planning considerations.

In support

Representations received from:

Maureen Roberts, 27 Harlech Crescent, Prestatyn  
 Richard Jones, 4 Bryn Ibod, Waen  
 Caroline Evans, 3 Bryn Ibod, Waen  
 Chris Moore, 13 Cilgant, Eglwys Wen, Bodelwyddan  
 Lindsay Thring, 74 Ffordd Idwal, Prestatyn  
 Nicky Pattison, 2 Bryn Ibod, Waen  
 Karen Dean, 34 Highlands Road, Rhuddlan  
 David Jackson, 15 Tynewydd Road, Rhyl  
 Derrick Jones, Bryn Ibod Farm, Tremeirchion  
 Marina Hatenoer, The Nook, Trefnant

Janet Newman-Carty, 13 Llys Ogwen, Prestatyn  
Lowri Williams, Jacobs Ladder, Chester Street, St. Asaph  
Lynsey Lloyd-Thomas, 23 Gronant Road, Prestatyn  
Nuala Lloyd-Thomas, 23 Gronant Road, Prestatyn

Summary of planning based representations in support:

**Principle**

- Hospitality businesses have been adversely impacted by Covid19 & businesses need to diversify to survive.
- Proposal would help the existing business adapt & diversify.
- Supports local jobs.
- Encourages tourism to the area.
- Positive attribute for the local area & would support local economy.
- As more attractions and hospitality business open in the area there is need to provide a place where people holidaying here can stay.
- Visitors use local shops and services.

**Visual amenity:**

- Planting and landscaping is attractive.
- Fits in with surrounding landscape.
- Proposal has improved visual appearance of the site.
- New planting will help screen the site.
- Small development at end of carpark would not impact the local community.

**EXPIRY DATE OF APPLICATION: 02/06/2020**

**EXTENSION OF TIME AGREED? 3/9/2020**

**REASONS FOR DELAY IN DECISION (where applicable):**

- additional information required from applicant
- re-consultations / further publicity necessary on amended plans and / or additional information
- awaiting consideration by Committee

**PLANNING ASSESSMENT:**

**1. THE PROPOSAL:**

**1.1 Summary of proposals**

- 1.1.1 The proposal is for operational development associated with the use of land as a 'Certified Location' caravan site.
- 1.1.2 Members should note that the use of land as 'Certified Location' caravan site would fall within permitted development rights and therefore the change of use of land does not form part of the application. Please see section 1.7 below for further clarification on this issue.
- 1.1.3 The operational development subject of the application includes:
- Formation of a new vehicular access into the site from the existing pub carpark, which is served by an existing vehicular access off the public highway.
  - Formation of internal access tracks formed with stone base and crushed aggregate / gravel surface.
  - Laying stone base to caravan pitches which have been soiled over and re-turfed.
  - Installation a drinking water tap.
  - Installation of 5 no. electricity hook up points.
  - Installation of a chemical toilet waste disposal facility with rinsing tap.
  - Formation of a wildlife pond and landscaping within the site.

1.1.4 The application is retrospective in nature and majority of works have already been carried out.

1.2 Other relevant information/supporting documents in the application

1.2.1 Additional highway information including details of visibility splays and swept path analysis were provided during the course of the application to demonstrate that towed caravans can access and exit the site via the existing carpark vehicular access, and can manoeuvre within the site, without detriment to highway safety.

1.2.2 An additional planning statement was also submitted to address concerns raised in public consultation responses.

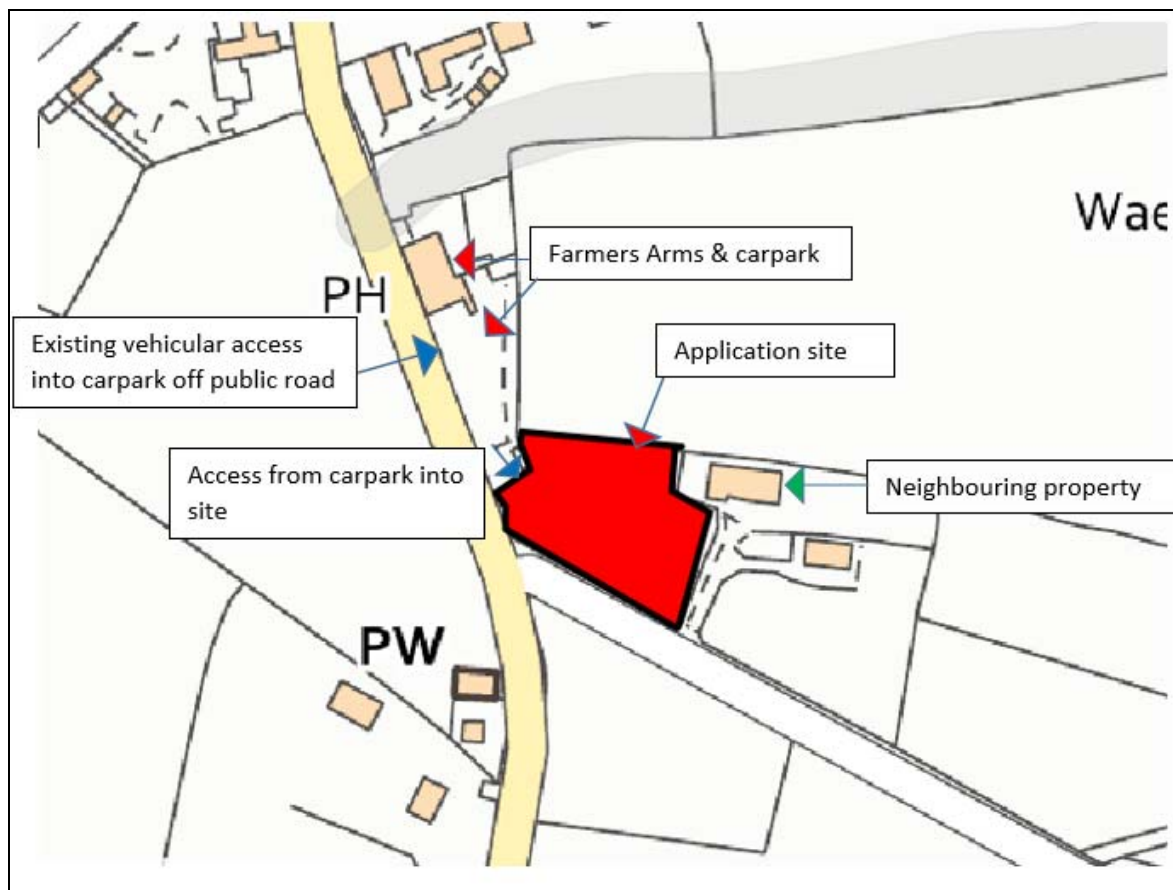
1.3 Description of site and surroundings

1.3.1 The Farmers Arms is situated along a minor road (Brynibod junction to A55) in the village of Waen and the site is a small field which is immediately adjacent to the pub carpark. A field gate previously provided access into the field from the car park.

1.3.2 The carpark is served by an existing vehicular access is off the B5429.

1.3.3 There is a residential dwelling to the east of the site known as Bwthyn Arthur, to the north lies agricultural fields and to the south the site abuts the public highway.

1.3.4 The plan below shows the relationship between the site and the Farmer's Arms:



1.4 Relevant planning constraints/considerations

- 1.4.1 The site lies outside of any established development boundary and is therefore considered to lie within the open countryside.

**1.5 Relevant planning history**

- 1.5.1 None.

**1.6 Developments/changes since the original submission**

- 1.6.1 Additional highway information and a supporting statement has been submitted during the course of the application.

**1.7 Other relevant background information**

- 1.7.1 It is noted that a number of objections received relate to the use of land as a caravan site.

- 1.7.2 For clarity the use of land as a caravan site which has been certified by an 'exempted organisation' such as the Caravan and Motorhome Club to be used by not more than five caravans at any time would fall within permitted development rights by virtue of Part 5 of Schedule 2 to the Town and County Planning (General Permitted Development) Order 1995 (as amended).

- 1.7.3 Sites which fall within these permitted development rights are referred to as 'Certified Locations'.

- 1.7.4 The applicants have applied to the Caravan and Motorhome Club for the site to become a Certified Location, and a letter dated 13 March 2020 has been submitted with the application which confirms the Caravan and Motorhome Club are happy to proceed with the application for the site to become a Certified Location.

- 1.7.5 Once certified, the use of land as a caravan site would be permitted development, and accordingly the change of use of land is not for debate at this time.

- 1.7.6 Officers would also take the view that the formation of a vehicular access from the existing pub carpark (which is already served by a vehicular access point from the public highway) could be considered to fall within permitted development rights under Part 2 of the 1995 Order, however given the concerns raised by the local community, additional information was sought regarding the visibility at the existing access and turning space within the site for caravans.

- 1.7.7 The applicant has also made improvements to the existing vehicular access with the public highway to improve the visibility, including repositioning the gates further within the site to provide visibility splays and car parking bays within the carpark have been stepped back slightly prevent park cars next to the access blocking sight lines. Officers would note these works to the vehicle access have been carried out under permitted development rights and do not form part of the application.

- 1.7.8 On the matter of surface water drainage, developments involving a construction area of more than 100sq.m may be subject to the Sustainable Urban Drainage (SuDs) approval process, and a separate consent from Denbighshire County Council as the appointed SuDS Approval Body would be required in addition to planning consent.

**2. DETAILS OF PLANNING HISTORY:**

- 2.1 N/A

**3. RELEVANT POLICIES AND GUIDANCE:**

The main planning policies and guidance are considered to be:

**3.1 Local Policy/Guidance**

Denbighshire Local Development Plan (adopted 4<sup>th</sup> June 2013)  
**Policy PSE5** – Rural economy

## Policy VOE5 – Conservation of Natural Resources

### Supplementary Planning Guidance

Supplementary Planning Guidance Note: Conservation and Enhancement of Biodiversity

Supplementary Planning Guidance Note: Caravans, Chalets & Camping

### 3.2 **Government Policy / Guidance**

Planning Policy Wales (Edition 10) December 2018

Development Control Manual November 2017

Technical Advice Note (TAN) 18: Transport (2007)

### 3.3 **Other material considerations**

## 4. MAIN PLANNING CONSIDERATIONS:

In terms of general guidance on matters relevant to the consideration of a planning application, Section 9.1.2 of the Development Management Manual (DMM) confirms the requirement that planning applications 'must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. It advises that material considerations must be relevant to the regulation of the development and use of land in the public interest, and fairly and reasonably relate to the development concerned. The DMM further states that material considerations can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment (Section 9.4).

The DMM has to be considered in conjunction with Planning Policy Wales, Edition 10 (December 2018) and other relevant legislation.

The following paragraphs in Section 4 of the report therefore refer to the policies of the Denbighshire Local Development Plan, and to the material planning considerations which are considered to be of relevance to the proposal.

4.1 The main land use planning issues in relation to the application are considered to be:

- 4.1.1 Principle
- 4.1.2 Visual amenity
- 4.1.3 Residential amenity
- 4.1.4 Ecology
- 4.1.5 Drainage (including flooding)
- 4.1.6 Highways (including access and parking)

4.2 In relation to the main planning considerations:

#### 4.2.1 Principle

In terms of the national planning policy context, Planning Policy Wales 10 (December 2018) paragraph 3.56 states that development in the countryside should be located within and adjoining those settlements where it can be best be accommodated in terms of infrastructure, access and habitat and landscape conservation. It also advises that new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.

The Community Council and a number of public representations received have raised concerns regarding the principle of the use of land as a caravan site. However, as detailed in section 1.7 above, the site would be operated as a Caravan and Motorhome 'Certification Location', meaning the use of land as a caravan site for not more than five caravans would fall within permitted development rights. Planning permission is therefore not required for the change of use of land to a caravan site

and the merits or otherwise of a such a use in this location are not the subject of this application.

The application currently before the Council is limited to the associated operational development, which including formation of internal access tracks; laying hardcore below caravan pitches which have now been turfed over; installation of electricity hook up points, a chemical toilet disposal unit and a drinking tap; and associated landscaping.

Whilst public representations have noted that the proposed works exceed the minimum required infrastructure for a Certified Location caravan site, that does not preclude the applicant from providing enhanced facilities at the site and any operational development proposed should be assessed on its own merits.

Having regard to the permitted use of the site as a caravan site, Officers would conclude that associated development on the site would be acceptable in principle, subject to an assessment of detailed impacts which are set out in the remainder of the report.

#### 4.2.2 Visual amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The visual amenity and landscape impacts of development should therefore be regarded as a potential material consideration.

Objections have been raised by the Town Council and members of the public on visual amenity grounds.

Officers would note that the use of land as a caravan site is not subject of the application and the assessment of impact on visual amenity is limited to the operational development proposed.

The site is located between a pub carpark to the west and a residential property to the east. To the north the site abuts open fields and to the south the site abuts a public highway.

Whilst the site is located outside of development boundaries, is well related to the public house and is enclosed between the car and the neighbouring residential property. Whilst the new internal access tracks have reduced the extent grassed area within the site, Officers would note the hardcore laid below the pitches has now been re-turfed over, and other infrastructure such as hook up points, water tap and chemical toilet disposal unit are very minor in scale and having regard to the scale and nature of the proposal, the operational works proposed would not detract from the rural character of the local area..

Whilst concerns have been raised that the planting and landscaping proposed does not adequately screen the site, given the permitted use of the land as a caravan site, Officers would note that the planting and landscaping proposed is not put forward as a mitigation or compensation measure to offset harm from the operational development proposed, but rather as enhancement features to improve the aesthetics of the site.

Officers would further note the planting proposed could be carried out without the need for planning permission, and therefore Officers do not consider there are any reasonable planning grounds to require alternative or additional planting to be provided within the site.

With respect to the pond, having regard to its size and extent of works carried out to construct it, Officers would consider it a borderline case as to whether this constitutes development or if it would be considered to be de minimus works. Nevertheless, having regard to the permitted use of land as a caravan site, the formation of a small pond within the site would be acceptable, and it would not give rise to adverse impacts on visual amenity.

Having regard to the design, siting and scale of the operational development proposed, in relation to the locality and landscape, it is considered the proposals would not have an unacceptable impact on visual amenity and would therefore be in general compliance with the tests in the policies referred to.

#### 4.2.3 Residential amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The residential amenity impacts of development should therefore be regarded as a potential material consideration.

Objections have been raised by the Town Council and members of the public on residential amenity grounds, which mainly relate to the impact of a caravan site in such close proximity to the property in terms of outlook, privacy, noise and disturbance.

The eastern boundary of the site abuts the residential curtilage of the neighbouring property, Bwthyn Arthur.

Whilst it is acknowledged that the operation of a caravan site next door to a residential property may impact upon the level of amenity currently enjoyed by that property, Officers would reiterate again that as the use of land is permitted development, and therefore the impact of a caravan site in this location is not for debate and the assessment of impact on the neighbouring property has to be limited to the operational development which is subject of the application.

Nevertheless, planting is proposed along the boundary with the neighbouring property in an effort to help mitigate the impact of the permitted caravan use of the land.

Having regard to the scale, location and design of the operational development put forward, it is considered that the proposals would not have an unacceptable impact on residential amenity of the neighbouring property or other properties in the vicinity of the site, and the proposal would therefore be in general compliance with the tests of the policies referred to.

#### 4.2.4 Ecology

Policy VOE 5 requires due assessment of potential impacts on protected species or designated sites of nature conservation, including mitigation proposals, and suggests that permission should not be granted where proposals are likely to cause significant harm to such interests.

This reflects policy and guidance in Planning Policy Wales (Section 6.4), current legislation and SPG 18 – Nature Conservation and Species Protection, which stress the importance of the planning system in meeting biodiversity objectives through promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable.



Objections have been raised by members of the public on ecological grounds.

An ecological assessment has not been provided with the application.

Whilst the site is a greenfield site located in open countryside, having regard to the nature and scale of the proposed works, and that no existing trees or hedgerow were proposed to be removed, and ecological assessment was not considered necessary.

Whilst concerns have been raised that the planting and landscaping proposed includes non-native species, given the permitted use of the land as a caravan site, Officers would note that the planting and landscaping proposed is not put forward as a mitigation or compensation measure to offset harm from the operational development proposed, but rather as enhancement features to improve the aesthetics of the site. Officers also note that additional planting and the formation of the pond would provide opportunities for wildlife.

Officers would further note the planting proposed could be carried out without the need for planning permission, and therefore Officers do not consider there are any reasonable planning grounds to require alternative planting to be provided within the site.

#### 4.2.5 Drainage (including flooding)

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The drainage and flood risk impacts of development should therefore be regarded as a potential material consideration.

Concerns have been raised by Town Council and members of the public on drainage grounds.

The Council's Drainage Officer has considered that the proposal would need separate SAB approval and in making its decision the SAB will take account of any local knowledge or concerns regarding drainage.

NRW has raised no objection to the proposal, but has provided advice with respect to the discharge from the chemical toilet disposal unit into the septic tank.

Objections have also be raised on grounds of water pollution, as ditches have been referred to as having 'grey water' which representations allege is as a result of discharges from the existing septic tank. Concerns have also been raised that chemical toilet waste would discharge into the ditches.

The supporting statement submitted notes the applicants have liaised with NRW on the chemical toilet disposal unit and that they will ensure suitable biodegradable products only are used by visitors in their caravans toilets to ensure it can discharge to the septic tank. Officers would note that septic tanks and any discharges from it to land would be subject to separate environmental permitting requirements.

The tracks have been formed by stone hardcore base, and surfaced with aggregate and are stated to be permeable. The pitches have been laid with a stone hardcore base which has been soiled over and re-turfed and are also stated to be permeable.

It is understood ditches run along the boundary of the site, which drainage from the land runs into and members of the public have raised concerns that the development would increase run off and lead to flooding offsite.

On the matter of surface water drainage, Officers would note that as the tracks exceed 100sq.m in area, the proposal would be subject to the Sustainable Urban Drainage (SuDs) approval process. Drainage officers have raised no objection with the principle of the proposal on drainage grounds and therefore as separate consent from the SuDS Approval Body would be required in addition to planning consent, Officers do not consider it necessary to request additional drainage details as it would duplicate other regulatory controls.

Having regard to the above, and the controls that would be applied through separate environmental permitting and SuDs approval process, Officers would conclude that the proposal would not give rise to unacceptable impacts on the interests listed above.

#### 4.2.6 Highways (including access and parking)

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The highway impacts of development should therefore be regarded as a potential material consideration.

Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. These policies reflect general principles set out in Planning Policy Wales (PPW) and TAN 18 – Transport, in support of sustainable development.

The Parking Standards in New Developments SPG sets out the maximum parking standards for new developments.

Concerns have been raised by the Community Council and members of the public on highway safety grounds in terms of visibility and road speeds.

Officers would stress again that the use of land as a caravan site is considered to be permitted development, and therefore the assessment of the proposal on highway safety has to be limited to the impact of the proposed operational development and not the use of land.

The site would be accessed from the highway via the existing pub carpark vehicular access and then via the proposed new access into the site from the carpark. Whilst a new access off the highway is not required, details of visibility splays and swept path analysis were requested to demonstrate caravans on tow could safely access the site and manoeuvre within it.

The applicant has also sought to step back the gates at the carpark access to improve visibility and step a parking bay further in the site to prevent parked cars obscuring visibility sight lines. Officers would note these works do not form part of the proposal and have been carried out under permitted development rights.

Highway Officers have considered the proposal, having regard to the fact the use of land as a caravan site would be permitted development and acknowledging the site would utilise an existing access off the highway.

Highways Officers are satisfied that caravans can safely manoeuvre within the site, and whilst there is a shortfall in visibility standards at the existing access with the highway, Highway Officers recognise that improvements have been made to the existing access and note there should be scope for a limited redevelopment that

incorporates a substantial access improvement, even though the improved access would still be below standard.

Highways Officers have advised that there have been no reported accidents in the last five years and given the restricted use of this small scale development and the submitted details, Highways Officers do not foresee any highway related issues arising from the development and therefore have no objection to the proposals. Notwithstanding the concerns raised by the Community Council and local residents, Officers consider the proposal has to be based on the proposals put forward and not on the use of land, and accordingly the proposal is not adjudged to give rise to any unacceptable impacts on highway safety.

#### Other matters

##### Well – being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on the Council not only to carry out sustainable development, but also to take reasonable steps in exercising its functions to meet its sustainable development (or well-being) objectives. The Act sets a requirement to demonstrate in relation to each application determined, how the development complies with the Act.

The report on this application has taken into account the requirements of Section 3 'Well-being duties on public bodies' and Section 5 'The Sustainable Development Principles' of the Well-being of Future Generations (Wales) Act 2015. The recommendation is made in accordance with the Act's sustainable development principle through its contribution towards Welsh Governments well-being objective of supporting safe, cohesive and resilient communities. It is therefore considered that there would be no significant or unacceptable impact upon the achievement of well-being objectives as a result of the proposed recommendation.

## **5. SUMMARY AND CONCLUSIONS:**

- 5.1 The proposal is for operational development associated with the use of land as a 'Certified Location' caravan site which includes formation of a new internal access from the existing pub carpark, internal access tracks, electricity hook up points, water tap, chemical toilet disposal unit and associated landscaping.
- 5.2 Members are reminded the use of land as a 'Certified Location' caravan site to be used by not more than five caravans is permitted development, and therefore the use of land is not subject of the application, and the assessment of impacts is solely based on the operational development.
- 5.3 Objections have been received by the Community Council and local residents on a number of grounds, however a number of representations in support of the proposal have also been received.
- 5.4 Notwithstanding the concerns raised, having regard to the Having regard to the scale and nature of the operational development put forward, the potential impacts on the locality, and the particular tests of the relevant policies, the application is considered to be acceptable and is recommended for grant.

**RECOMMENDATION: GRANT-** subject to the following conditions:-

1. The development to which this permission relates shall be begun no later than 2nd September 2025
2. The development hereby permitted shall be carried out in strict accordance with details shown on the following submitted plans and documents unless specified as otherwise within any other condition pursuant to this permission:
  - (i) Caravan Club Documentation (4 Documents) - Received 13 March 2020
  - (ii) Existing Site Plan - Received 13 March 2020

- (iii) Electric Hook Up Specification (Drawing No. Fig 1) - Received 13 March 2020
- (iv) Tap Specification (Drawing No. Fig 2) - Received 13 March 2020
- (v) Septic Tank Cover Information (Drawing No. Fig 3) - Received 13 March 2020
- (vi) Additional Septic Information - Received 30 March 2020
- (vii) Proposed Site Plan - Received 13 March 2020
- (viii) Location Plan - Received 13 March 2020
- (ix) Access Arrangements Plan - Received 30 April 2020
- (x) Additional Plan - Received 30 April 2020
- (xi) Swept Path Analysis Plan (1493/01 Rev A) - Received 5 June 2020
- (xii) Visibility Splay Plan (1493/02 Rev A) - Received 11 June 2020
- (xiii) Highway Issues Report (1493 HA) - Received 5 June 2020
- (xiv) Planning Support Statement - 8 June 2020
- (xv) Access Plans (2 Drawings) - Received 5 June 2020

The reasons for the conditions are:-

1. To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.
2. For the avoidance of doubt and to ensure a satisfactory standard of development.

# Agenda Item 7

**WARD :** Tremeirchion

**WARD MEMBER(S):** Cllr Christine Marston (c)

**APPLICATION NO:** 47/2020/0420/ PS

**PROPOSAL:** Deletion of Condition 8 of Planning Permission 47/2003/0132 and deletion of Condition 7 on Appeal Decision APP/A/03/1117348 to allow for an extended 12 month all year round holiday season.

**LOCATION:** Penisa'r Mynydd Caravan Park Caerwys Road Rhualt St. Asaph

This page is intentionally left blank



© Crown copyright and database rights 2020 Ordnance Survey 100023408

47/2020/0420

Scale: 1:2500

Printed on: 10/8/2020 at 15:57 PM





**WARD :** Tremeirchion

**WARD MEMBER(S):** Cllr Christine Marston (c)

**APPLICATION NO:** 47/2020/0420/ PS

**PROPOSAL:** Deletion of Condition 8 of Planning Permission 47/2003/0132 and deletion of Condition 7 on Appeal Decision APP/A/03/1117348 to allow for an extended 12 month all year round holiday season.

**LOCATION:** Penisa'r Mynydd Caravan Park Caerwys Road Rhualt St. Asaph

**APPLICANT:** Mr Graham Dobbs

**CONSTRAINTS:** None.

**PUBLICITY UNDERTAKEN:** Site Notice - Yes  
Press Notice - No  
Neighbour letters - Yes

**REASON(S) APPLICATION REPORTED TO COMMITTEE:**  
**Scheme of Delegation Part 2**

- Recommendation to grant / approve – 4 or more objections received

**REASON FOR DELEGATED DECISION**  
**Scheme of Delegation Part 1, Section 1.1**

**CONSULTATION RESPONSES:**

RHUALLT COMMUNITY COUNCIL-

No objection subject to the following conditional issues:

'Whilst there may be some benefit to the local economy there is no confidence that it would be sufficient to offset the possible increased cost to the local authority and public services which could be generated by caravan owners who do not adhere to the restrictions and remain upon the site during the twelve month period without paying Council Tax. Unless there is a robust system implemented by the Local Authority to make regular checks upon the occupation of the site, with enforcement of any breaches of the conditions, there is some concern that the conditions may be abused and go unnoticed.

The access route from the A55 to Penisa'r Mynydd Caravan Park is in a poor state of repair, with pot holes and the tarmac surface at the edge of the road is constantly being damaged and worn away, with only one passing place. An increase in the number of vehicles travelling to and from the site will only have a detrimental effect on the already poor condition of the road.'

NATURAL RESOURCES WALES-

No objection.

DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

- Highways Officer-  
No objection

- Public Protection Officer-  
A separate license will be required should this application be granted.

- Strategic Planning & Housing Policy Officer- Support the proposal providing a replacement occupancy condition is attached as described in the Caravans, Chalets and Camping SPG (2018). Policy PSE12 of the LDP restricts occupation of caravan sites to holiday use only. The Caravans, Chalets and Camping SPG recognises that extending the tourist season beyond the traditional holiday times of the year has advantages to the local economy but holiday occupancy conditions should be attached to restrict any residential occupation.

## **RESPONSE TO PUBLICITY:**

### In objection

Representations received from:

Ms Wilson, Hendre Fawr, Rhualt Frederick Thomas, 72 Victoria Drive, Bognor Regis, West Sussex Mr and Mrs Algie, Ty'n Y Caeau, Holywell Road, Rhualt Mrs E A Morris, Penisa'r Waen, Rhualt Jane Pauline Jones, Rhedyn Coch, Rhualt, St. Asaph

Summary of planning based representations in objection:

#### *Justification*

Lack of justification for the proposal.

A touring caravan on a fixed site is more or less a static which is against policy.

#### *Access*

Road access off A55 is unsuitable for increased traffic

The condition of the access road needs attention and will get worse over winter with more vehicle use.

#### *Residential amenity including noise issues*

Noise from dogs barking at the site, music playing, people shouting

Noise already an issue which will be exacerbated with year round occupancy

Impacts to nearby farms by dogs causing stress and injury to farm animals and straying of PROW's, damaging fences etc.

#### *Residential occupancy*

Concerns this would allow residential use arriving day or night 52 weeks per year.

#### *Landscaping and visual amenity*

Previous permissions included that the boundary hedge was kept to a minimum of 6ft to ensure screening but this has not been implemented.

Visual amenity impacts due to lack of screening.

Litter from holiday makers into nearby fields impacting the visual amenity

**EXPIRY DATE OF APPLICATION: 28/07/2020**

## **REASONS FOR DELAY IN DECISION:**

- Awaiting consideration at Planning Committee

## **PLANNING ASSESSMENT:**

### **1. THE PROPOSAL:**

#### 1.1 Summary of proposals

- 1.1.1 The proposal is for the deletion of Condition 8 of Planning Permission ref. 47/2003/0132 which approved the additional use of land for winter storage of caravans to allow 17 touring caravans to form an extension to the existing touring caravan site, revised layout of 6 existing touring caravan pitches and extension to touring caravan site to form open amenity space/recreation area and landscaping.

Condition 8 required that no caravans shall remain on the site between the 31<sup>st</sup> October in any one year and the 1<sup>st</sup> March in the succeeding year other than those allowed under Condition 7 for winter storage which should only take place in the area indicated on the plan for the period of 1<sup>st</sup> November in any one year to 28<sup>th</sup> February in the following year.

The proposal is also for the deletion of Condition 7 on the allowed Appeal Decision APP/A/03/1117348 which was originally refused by the Council on 26/11/2002 (ref. 47/2002/0693) which was for the change of use of land to form extension to the existing touring caravan site, for the following reason:

1. *The proposed extension to the existing touring caravan site, would conflict with criteria i) of Policy TSM12 of the Denbighshire Unitary Development Plan. It would increase the obtrusiveness of the site within the open countryside to the detriment of the rural character and appearance of the area.*

Condition 7 requires that no caravans shall remain on the appeal site between 1<sup>st</sup> November in any one year and 28<sup>th</sup> February in the following year (both dates inclusive) other than those allowed for under Condition number 6 above for winter storage.

The reason for the deletion of the conditions is to allow for an extended 12 month all year round holiday season.

#### 1.2 Description of site and surroundings

- 1.2.1 Penisa'r Mynydd is a touring caravan park sited approximately 3kms north east of Rhualt. Access is gained via a Class C highway with direct and recently improved access to the A55 (t) at Glan Llyn interchange. The site is centred on a dwelling and cluster of buildings used as amenity block. The site is bounded on all sides by established field hedgerows.

#### 1.3 Relevant planning constraints/considerations

- 1.3.1 The site is located outside of the Rhualt development boundary and is considered to be in the open countryside for planning purposes.

#### 1.4 Relevant planning history

The original scheme approved the additional use of land for winter storage of caravans to allow 17 touring caravans to form an extension to the existing touring caravan site, revised layout of 6 existing touring caravan pitches and extension to touring caravan site to form open amenity space/recreation area and landscaping.

The other earlier scheme allowed at appeal was for the change of use of land to form extension to the existing touring caravan site.

#### 1.5 Developments/changes since the original submission

None

#### 1.6 Other relevant background information

None

## 2. **DETAILS OF PLANNING HISTORY:**

TRE/0322/87 – Use of field for touring caravan site – GRANTED 16 November 1987

TRE/247/93 – Extension to touring caravan site – Limited total number of touring caravans to 30 maximum – GRANTED 1<sup>st</sup> September 1993

47/2000/744/PF – Change of use of land to form extension to touring caravan site (Limited to 35 units maximum) – GRANTED 22<sup>nd</sup> September 2000

47/2001/502/PS – Variation of Condition No. 2 on 47/2000/744 to allow an additional caravan (maximum limit of 36 imposed) – GRANTED 2<sup>nd</sup> July 2001

47/2001/0723/PF – Change of use of land to form extension to touring caravan park by relocation of play areas and siting of 6 additional touring caravans (maximum number of touring caravans limited to 42) –GRANTED 5<sup>th</sup> December 2001

47/2001/0971 – Erection of replacement toilet and amenity building and continuation of use of land for winter storage of touring caravans (partly in retrospect), GRANTED 5/12/2001

47/2002/0693/PF – Change of use of land to form extension to touring caravan site. Total number of touring caravans proposed 75 - Refused following referral to Full Council on landscape impact grounds 26th November 2002

Reason:

1. *The proposed extension to the existing touring caravan site, would conflict with criteria i) of Policy TSM12 of the Denbighshire Unitary Development Plan. It would increase the obtrusiveness of the site within the open countryside to the detriment of the rural character and appearance of the area.*

The application was appealed under ref. APP/A/03/1117348 and allowed by the Inspector.

47/2003/0132 - Additional use of land for winter storage of caravans to allow 17 touring caravans to form an extension to the existing touring caravan site, revised layout of 6 existing touring caravan pitches and extension to touring caravan site to form open amenity space/recreation area and landscaping, GRANTED 26/03/2003

47/2005/0923 Formation of car parking bays, GRANTED 27/10/2005

### **3. RELEVANT POLICIES AND GUIDANCE:**

#### **3.1 Local Policy/Guidance**

The main planning policies and guidance are considered to be:  
Denbighshire Local Development Plan (adopted 4th June 2013)

**Policy PSE5** – Rural economy

**Policy PSE12** – Chalet, static and touring caravan and camping sites

**Policy PSE14** – Outdoor activity tourism

#### **Supplementary Planning Guidance**

Supplementary Planning Guidance Note: [Access For All](#)

Supplementary Planning Guidance Note: [Caravans, Chalets & Camping](#)

Supplementary Planning Guidance Note: [Trees & Landscaping](#)

#### **3.2 Government Policy / Guidance**

Planning Policy Wales Edition 10 December 2018

Development Control Manual November 2016

Technical Advice Notes:

TAN 6- Sustainable Rural Communities (2010)

Circulars

Welsh Government Circular 016/2014 The Use of Planning Conditions for Development Management

#### **3.3 Other Material Considerations**

#### 4. MAIN PLANNING CONSIDERATIONS:

In terms of general guidance on matters relevant to the consideration of a planning application, Section 9.1.2 of the Development Management Manual (DMM) confirms the requirement that planning applications 'must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. It advises that material considerations must be relevant to the regulation of the development and use of land in the public interest, and fairly and reasonably relate to the development concerned.

The DMM further states that material considerations can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment (Section 9.4).

The DMM has to be considered in conjunction with Planning Policy Wales, Edition 10 (December 2018) and other relevant legislation.

The following paragraphs in Section 4 of the report therefore refer to the policies of the Denbighshire Local Development Plan, and to the material planning considerations which are considered to be of relevance to the proposal.

##### 4.1 The main land use planning issues in relation to the application are considered to be:

- 1.1.1 Principle
- 1.1.1 Visual amenity
- 1.1.2 Residential amenity
- 1.1.3 Highways (including access and parking)

In relation to the main planning considerations:

##### 1.1.4 Principle

An application can be made under section 73 of the Town and Country Planning Act 1990 to vary or remove conditions associated with a planning permission. One of the uses of a section 73 application is to seek a minor material amendment, where there is a relevant condition that can be varied.

Local Development Plan Policy PSE 12 relates to chalet, static and touring caravan and camping sites.

The policy states proposals for new static caravan sites will not be permitted.

It allows for the environmental improvement of existing static holiday caravan or chalet sites by remodelling, provision of new facilities and by landscaping subject to proposals being acceptable in terms of other plan policies and such a proposal;

- preserves the or enhances the character of the area
- demonstrates that any increase in the number of static caravan / chalet units would preserve or enhance the landscape setting of the overall site

PSE12 does not permit the change of use of a static caravan or chalet from tourist to residential use, or the conversion of touring caravan sites to statics. Policy PSE 12 encourages new touring and camping sites where all of four tests are met. These relate to the appropriateness of the scale and location; whether the scheme would result in an over concentration of sites in a locality; whether it would make a positive contribution to biodiversity, the natural and built environment; whether the development would appear obtrusive in the landscape, is of high quality layout etc, and has no adverse highway or community impacts.

Local Development Plan Policy PSE 5 outlines the general intent of the Local Development Plan to help sustain the rural economy, through the support of tourism and commercial development, subject to consideration against detailed criteria relating to the character and distinctive qualities of the local landscape.

Policy PSE 14 relates specifically to outdoor activity tourism. It supports proposals for development that expand or reinforce the tourism offer of the County in this sector, provided four criteria are met:

- the development is appropriate to its setting and within the capacity of the local environment and infrastructure ,particularly within designated area such as the AONB and World heritage Site
- any suitable buildings are converted or re-used in preference to new build
- necessary mitigation measures are included and there would be no unacceptable impact on the local community
- chalet development in association with outdoor activity tourism will only be permitted if a significant need is demonstrated and there are no opportunities to us or convert existing buildings.

The Welsh Minister's Letter regarding Covid-19 Guidance dated 20<sup>th</sup> July, discussed caravan parks and self catering accommodation which stated that, *"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.*

*A streamlined approach to applications made under section 73 of the 1990 Act and for site licences was proposed during discussions with the industry, Welsh Local Government Association (WLGA) and the Planning Officers Society Wales (POSW). I would encourage Authorities through POSW and the WLGA to work with the industry to develop application procedures which minimise inconvenience and cost for applicants while providing authorities the information they need to make a decision within an efficient timescale.*

*I am clear that local planning authorities should support caravan sites and other self-catering accommodation through this crisis by amending conditions to refer to holiday occupancy restrictions rather than using a season occupancy basis, where a policy need is set out in the development plan. Pursuing a seasonal occupancy restriction to protect local features should be the exception, especially between the 2020 and 2021 seasons, and any time restriction should be kept to the minimum necessary to avoid significant harm."*

In addition to the latest guidance from Welsh Government, Officers are of the opinion that over recent years there has been a notable shift from 'seasonal occupancy' controls on caravan sites, to allowing all year round occupancy. The use of 'seasonal occupancy' conditions stems from a number of years ago when certain types of caravan accommodation were not considered suitable for year round use – especially not in the winter. However, as stated in Welsh Government Circular 016/2014 'The Use of Planning Conditions for Development Management', it is considered that most modern self-catering accommodation is capable of occupation all year round. Where such accommodation is located in areas within which the provision of permanent housing would be contrary to national and/or local policies, it may be reasonable to impose a condition specifying its use as holiday accommodation. The circular clearly states that "A holiday occupancy condition would be more appropriate than a seasonal occupancy condition."

On the basis of this, the deletion of seasonal occupancy conditions and replacement with a 'holiday only' condition is considered to be in accordance with national guidance and policy. With respect to the Community Councils concerns, it is also considered to go some way to mitigating those fears.

The proposal is therefore considered to be acceptable in principle.

1.1.5 Visual amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The visual amenity and landscape impacts of development should therefore be regarded as a potential material consideration.

It is considered the site is not intrusive in the landscape and the existing hedging and planting screens the site well which helps it blend into the landscape. The layout is considered to be well-planned and has good access off the A55.

The nearest public vantage point is a set-back field gate along the C road to the south. From here there is an oblique view of the present south eastern site boundary at a distance of about 350m or so, but only the roofs of the existing touring caravans can be seen. The planting and landscaping reduces the visual impact of the site and improves the character and appearance of the landscape. The site is hidden from public view by the existing buildings from points to the west and north of the site and by hedgerows and mature trees.

The proposal relates to the occupancy of the site and so does not have any direct bearing upon the visual amenity of the area. Having said that, it is noted that if granted, the site could be used for holiday purposes all year round, and therefore caravans maybe more visible in the winter months due to reduced vegetation and foliage. However, it is noted that there is consent in place on parts of the site to allow winter storage of caravans.

In officer's opinion, given that there is already the potential for caravans to be sited on the site all year round, and the site being generally well screened, the proposal now being considered is unlikely to have such a detrimental impact on the visual amenity of the area as to justify refusal.

1.1.6 Residential amenity

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The residential amenity impacts of development should therefore be regarded as a potential material consideration.

Representations have been received regarding residential amenity concerns such as noise from the site and dogs barking.

The use of the site all year round may increase the noise, disturbance from passing traffic but the site is unlikely to be at full capacity during this time over the winter and therefore is considered to have a less of an impact than during the summer months. It is further considered that the actual number of additional vehicular journeys associated with the additional usage would be that significant as to justify refusing the application. If the proposal is acceptable in terms of noise and activity between March and October, it would be hard to construct a case to say that the equivalent level of activity was not acceptable between November and February.

With respect to the concerns raised by the Community Council and local residents, given the existing permissions in place, the nature of what is being proposed and national guidance in relation to using 'holiday occupancy' conditions over 'seasonal occupancy' conditions, it is considered that the proposal is not unacceptable in terms of its impact on residential amenity.

#### 1.1.7 Highways (including access and parking)

The Development Management Manual advises at paragraph 9.4.3 that material considerations must be fairly and reasonably related to the development concerned, and can include the number, size, layout, design and appearance of buildings, the means of access, landscaping, service availability and the impact on the neighbourhood and on the environment; and the effects of a development on, for example, health, public safety and crime. The highway impacts of development should therefore be regarded as a potential material consideration.

Policy ASA 3 requires adequate parking spaces for cars and bicycles in connection with development proposals, and outlines considerations to be given to factors relevant to the application of standards. These policies reflect general principles set out in Planning Policy Wales (PPW) and TAN 18 – Transport, in support of sustainable development.

The Parking Standards in New Developments SPG sets out the maximum parking standards for new developments.

Representations have been received regarding highways concerns including the road access off A55 being unsuitable for increased traffic and the condition of this road.

The Highway Officer has not objected to the proposal.

Whilst noting the concerns raised, Officers considered that the additional 4 months of use would not result in a significant change in vehicular flows from the existing situation. It is not considered that there is sufficient evidence to support refusing this application on highway safety grounds. The proposal is therefore considered acceptable in this regard.

#### Other matters

##### Well – being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 imposes a duty on the Council not only to carry out sustainable development, but also to take reasonable steps in exercising its functions to meet its sustainable development (or well-being) objectives. The Act sets a requirement to demonstrate in relation to each application determined, how the development complies with the Act.

The report on this application has taken into account the requirements of Section 3 'Well-being duties on public bodies' and Section 5 'The Sustainable Development Principles' of the Well-being of Future Generations (Wales) Act 2015. The recommendation is made in accordance with the Act's sustainable development principle through its contribution towards Welsh Governments well-being objective of supporting safe, cohesive and resilient communities. It is therefore considered that there would be no significant or unacceptable impact upon the achievement of well-being objectives as a result of the proposed recommendation.

#### **SUMMARY AND CONCLUSIONS:**

The removal of Condition 8 and 7 to allow for a year round holiday occupancy is considered to be acceptable subject to the imposition of a replacement condition around occupancy to restrict the use of the site to holiday purposes only.



**RECOMMENDATION: APPROVE**

Condition 8 on planning permission ref 47/2002/0693 and condition 7 on appeal decision ref APP/A/03/1117348 shall be deleted and replaced with the following condition:

No caravans on the site shall be used other than for holiday purposes only, and none shall be occupied at any time as a person's sole or main place of residence. The site licence holder shall maintain an up to date register of the names and addresses of the occupiers of the touring caravans and motor homes, and the dates each caravan or motor home arrives on the site and leaves the site. The register shall be made available on request for inspection by officers of the Local Planning Authority. Responsibility for the maintenance of the register shall be that of the caravan site licence holder or his/her nominated person(s).

Reason: To enable the Local Planning Authority to effectively monitor the use of the holiday units to ensure that no unauthorised permanent residential occupation of the units takes place on site.

This page is intentionally left blank