

Heading:

REFERENCE NO. 43/2013/1318/PF  
PLAS DEVA CARAVAN PARK,  
FFORDD TALARGOCH, MELIDEN

Graham Boase  
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Denbighshire County Council  
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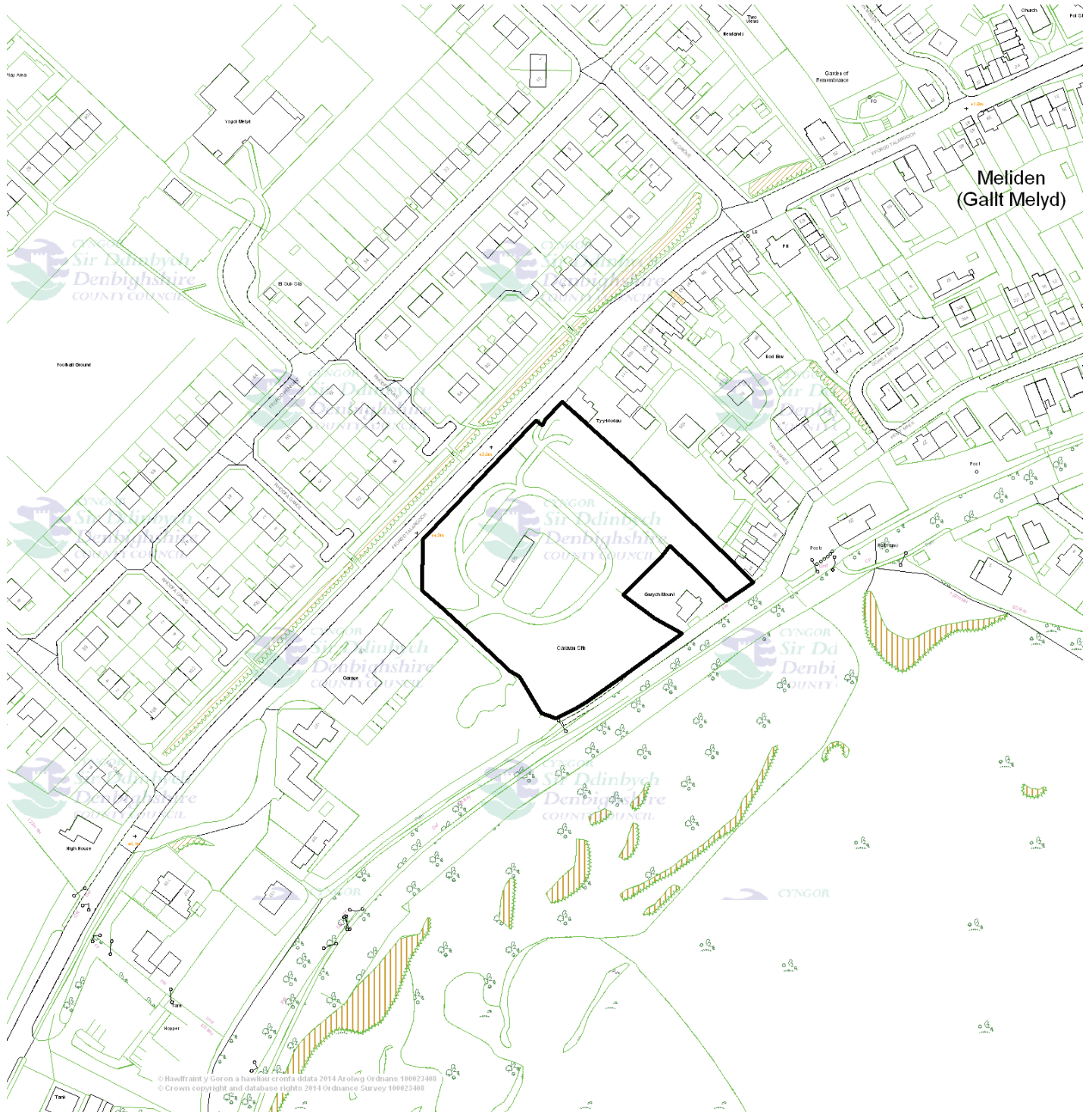
 Application Site



Date 3/6/2014  
Centre = 305959 E 380665 N

Scale 1/2500

This plan is intended solely to give an indication of the LOCATION of the application site which forms the subject of the accompanying report. It does not form any part of the application documents, and should not be taken as representative of the proposals to be considered, which are available for inspection prior to the meeting.



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# LAYOUT

Rice Drive Park, Fford Talargoch,  
Prestatyn, Wales

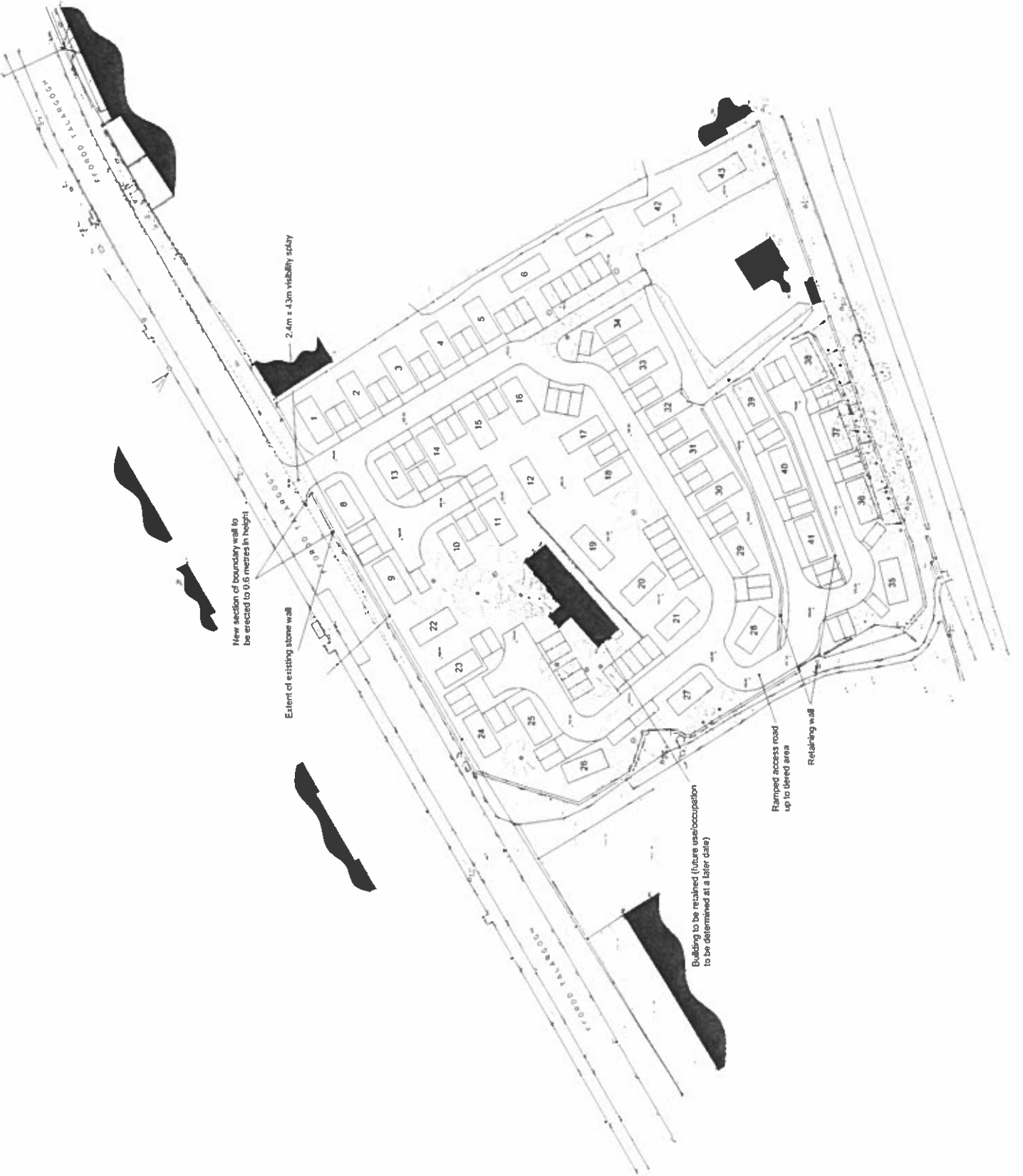
Firemigan Estates Limited

Proposed Site Layout Plan

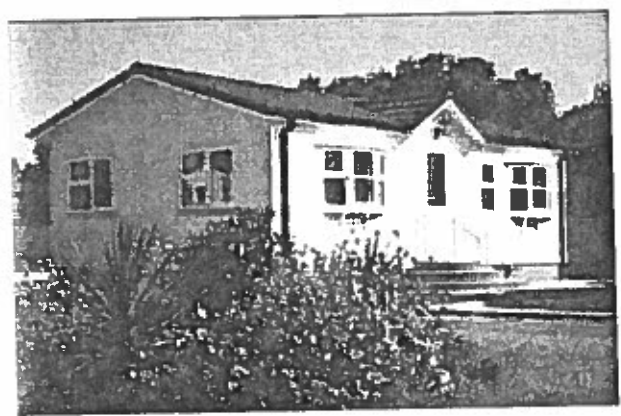
Planning Application No.	17/001	Date	28.03.2018
FLASA 2.002		Scale	1:1000

**Knights**  
1759

Plot 1759, Knights 1759, Fford Talargoch, Prestatyn, Gwynedd, LL23 7JG, Wales  
T: 01752 711121 F: 01752 711122 www.knights.co.uk



# TYPICAL PARK HOME



Drawing Title

Appendix 2 - Photographs of typical park homes

Project

Plas Deva Caravan Park, Fford Talargoch, Meliden, Prestatyn

Client

Flannigan Estates Limited

	Own	Scale	Ckd	Date	Dwg No	Rev
Planning Application	AK	NTS	CC	10 10 2013	FLA54/2-003	

# Knights

1759

The Brampton, Newcastle-under-Lyme, Staffordshire, ST5 0QW  
T01782 619225 F01782 712522 knightsllp.co.uk

Sarah Stubbs

**ITEM NO:** 2

**WARD NO:** Prestatyn Meliden

**WARD MEMBER:** Cllr Peter Evans

**APPLICATION NO:** 43/2013/1318/ PF

**PROPOSAL:** Change of use of land for the siting of up to 43 park homes for permanent residential occupation including access improvements and retention of existing building for site managers accommodation

**LOCATION:** Plas Deva Caravan Park Ffordd Talargoch Meliden Prestatyn

**APPLICANT:** MrW Flannigan Flannigan Estates Limited

**CONSTRAINTS:** Tree Preservation Order  
Wildlife Site  
PROW

**PUBLICITY UNDERTAKEN:** Site Notice – Yes  
Press Notice – Yes  
Neighbour letters - Yes

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

- Referral by Head of Planning / Development Control Manager

**CONSULTATION RESPONSES:**

PRESTATYN TOWN COUNCIL  
Awaiting response

**CLWYDIAN RANGE AND DEE VALLEY AREA OF OUTSTANDING NATURAL BEAUTY  
JOINT ADVISORY COMMITTEE**

“The JAC notes that this former caravan park which abuts the AONB boundary is allocated for housing in the LDP and, in this context, the committee has no objection in principle to development of the site for permanent residential use. The committee would prefer a more conventional housing development, but accepts that the site has an established prior use as a caravan park and that there may be a demand for low-cost park homes in the area.

However, whilst the principle of development is accepted the JAC is seriously concerned that the density of park homes proposed is excessive and will create an over developed appearance which will have a detrimental impact of the setting of the AONB. This is exacerbated by the need to remove a significant number of existing trees and shrubs, some of which are TPO protected, to facilitate such a high density. The proposed layout also appears regimented, lacking in visual interest and does not incorporate any open space or make provision for children’s play.

The JAC would therefore suggest that the proposals as submitted are unacceptable and would recommend a new approach to the design, layout and density of development on the site which will retain significant existing trees, ensure better separation of park homes to protect existing trees,

incorporates adequate open space and play provision, and includes a comprehensive landscaping scheme. Such a redesign will help soften the appearance of the development and better integrate it visually with the backdrop of Graig Fawr.

No details are provided of the proposed park home units, but the JAC would suggest that the colour of walls and roofs should be carefully controlled to ensure that the development presents a harmonious appearance which is in sympathy with its surroundings. In addition, if such permanent park homes enjoy residential permitted development rights these should be withdrawn by condition.

The intention to retain and extend the existing local stone frontage and boundary walls is supported.” (AONB Management Plan Policies PCP1 and PCP2)

#### NATURAL RESOURCES WALES

No objection

#### DWR CYMRU / WELSH WATER

No objection

#### DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

Head of Highways and Infrastructure

- Highways Officer

No objection subject to the inclusion of conditions requiring additional details to ensure the formation of a satisfactory access and visibility splays.

Pollution Control Officer

Expresses concerns relating to the detailed elements of the scheme which would need to be subject of a separate Site Licence, e.g. parking, drainage, water supply, refuse disposal, lighting

Tree Officer

Concerns raised to the original proposal to remove a number of trees which in turn would have a detrimental impact on the amenity of the area.

Ecologist

No objection subject to the inclusion of conditions requiring mitigation details for Common Lizards and an updated survey of plant species

Housing and Community Development Service

Has concerns relating to the principles of park homes in providing all year round housing accommodation

#### **RESPONSE TO PUBLICITY:**

Representations received from:-

Mr. J. Bowe, 6, Morfa Ddu Park, St. James Drive, Prestatyn

J. Huxley, 15, Morfa Ddu, St. James Drive, Prestatyn J. Blackshaw, 3, Morfa Ddu, St. James Drive, Prestatyn

Summary of planning based representations:

General comments from the owners of park homes on a site operated by the applicant on a nearby site in Prestatyn – outlining concerns regarding the management of the site. Also questions raised over potential flooding, drainage and lighting issues.

**EXPIRY DATE OF APPLICATION: 30/1/2014**

## REASONS FOR DELAY IN DECISION:

- additional information required from applicant
- protracted negotiations resulting in amended plans
- re-consultations / further publicity necessary on amended plans and / or additional information

## PLANNING ASSESSMENT:

### 1. THE PROPOSAL:

#### 1.1 Summary of proposals

- 1.1.1 The application seeks full planning permission for the change of use of land at Plas Deva Caravan Park for the siting of up to 43 'park homes' for permanent residential occupation, including access improvements and retention of an existing building for site managers accommodation.
- 1.1.2 The application has been submitted with a layout plan indicating the siting of 43 park homes and the retention of the former caravan site managers dwelling for the same purpose, in connection with the proposed park home site.
- 1.1.3 The Design and Access Statement submitted sets out the legislative background of park homes explaining that the application seeks consent for the use of the land for park homes for permanent residential use and explains that the detailed layout of the site will be done in accordance with regulations set out within the Caravan Sites and Control of Development Act 1960 as the units are within the definition of caravans and will require a Site Licence.
- 1.1.4 The application documents state that the park homes would be marketed to retired and semi-retired persons over the age of 55 and that the site is designed and laid out to be low maintenance.
- 1.1.5 It is stated that the units proposed are different to traditional static or touring caravans but are in accordance with the Caravan Sites and Control of Development Act 1960 (as amended) and the structures would comply with section 13 (1) of the 1968 Act.
- 1.1.6 A tree constraints plan has been submitted showing all Category A and B trees to be retained. Category A trees are high quality trees with life expectancy of at least 40 years and Category B trees are moderate quality with life expectancy of at least 20 years.

#### 1.2 Description of site and surroundings

- 1.2.1 Plas Deva is a vacant static and touring caravan site which is thought to have ceased operating in 2006 or 2007. This was prior to the submission of an outline application for residential development in 2007. The site contains all of the original concrete bases for the caravans and the site managers dwelling, known as 113 Ffordd Talargoch. The site is licenced for 65 caravans. It is relevant to note that the previous planning use and the licence allowed the site to be used for tourist use and not permanent residential occupation.
- 1.2.2 The site comprises of approximately 1ha of land and consists of a series of terraces sloping upwards to the rear of the site from Ffordd Talargoch.
- 1.2.3 The site has a number of trees which are protected by Preservation Orders located in a large group to the front of the site. An existing vehicular access to the site is to the north eastern corner . There is a secondary vehicular access off an existing track to the south western boundary which is now gated. Along Ffordd Talargoch the site is bounded by a

high stone wall.

1.2.4 The site shares its access with a private dwelling to the rear of the site (Gwrych Mount) which has a right of way leading through the site.

1.2.5 To the southern boundary the site abuts the Prestatyn to Dyserth walkway which lies at the base of Graig Fawr, which is a Site of Special Scientific Interest and within the Area of Outstanding Natural Beauty. Plans indicating the site location and accesses are attached to the front of the report.

### 1.3 Relevant planning constraints/considerations

1.3.1 The site is located within the development boundary of Meliden and is an allocated housing site within the Local Development Plan. This allocation reflects the planning permission which existed for residential development at the time of the adoption of the LDP. The site lies close to, but outside the boundary of the Area of Outstanding Natural Beauty and Graig Fawr Site of Special Scientific Interest.

### 1.4 Relevant planning history

1.4.1 Outline planning permission for residential development was granted in 2008, with an extension of time to submit reserved matters details for an additional 2 years agreed in 2011, which expired in October 2013. There are therefore no extant planning permissions in place for residential development.

### 1.5 Developments/changes since the original submission

1.5.1 The existing derelict building on the site is now shown to be retained for use as accommodation for a site manager in connection with the proposed park home site. All Category A and B trees within the site are now shown to be retained. Amendments to the access have been made with alterations proposed to the front boundary wall and visibility splays shown.

### 1.6 Other relevant background information

1.6.1 A 'Park Home' is defined as being a 'caravan' as set out in the Caravan Sites and Control of Development Act 1960 and 1968. A 'caravan' means any structure designed or adapted for human habitation which is capable of being moved from one place or another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adopted.

1.6.2 Park Homes are constructed in two sections off site and then transported to the site where they are bolted together on a concrete base, fitted out and connected to mains services. Park Homes can vary in width and length depending on the type of unit that a prospective occupier purchases and sites on the land, however the dimensions are limited by the Caravan Sites and Control of Development Act 1960 to a maximum of 20m in length, 6.8m in width and 3.05m in height when measured internally from the floor at the lowest point to the ceiling at the highest level. An illustration of a typical Park Home is provided at the front of the report.

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

2.1 43/2007/0714/PO Development of 1.0 ha of land for residential development and construction of new vehicular access (outline application) GRANTED at Planning Committee 3<sup>rd</sup> September 2008.

43/2011/0798/PS Variation of condition no's 2 and 3 of outline planning permission code no. 43/2007/0714 to extend the period for submission of reserved matters and commencement of development APPROVED under delegated powers 11<sup>th</sup> October 2011 with the following conditions imposed:

*Application for approval of reserved matters shall be made to the Local Planning Authority before the expiration of **two years** from the date of this permission.*

*The development hereby permitted shall be begun either before the expiration of five years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.*

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

The main planning policies and guidance are considered to be:

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

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

**Policy BSC 1** – Growth Strategy for Denbighshire

**Policy BSC 3** – Securing Infrastructure Contributions from Development

**Policy BSC 11** – Recreation and Open Space

**Policy BSC4** – Affordable Housing

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

**Policy VOE2** – Area of Outstanding Natural Beauty and Area of Outstanding Beauty

**Policy VOE5** – Conservation of natural resources

**Policy ASA3** – Parking standards

#### 3.1 Supplementary Planning Guidance

#### 3.2 Supplementary Planning Guidance 7: Residential Space Standards

Supplementary Planning Guidance 20: Static Caravan and Chalet Development

Supplementary Planning Guidance 21: Parking Standards

Supplementary Planning Guidance 25: Residential Development Design Guide

#### 3.3 Government Policy / Guidance

Planning Policy Wales Edition 6 February 2014

### **4. MAIN PLANNING CONSIDERATIONS:**

In terms of general guidance on matters relevant to the consideration of a planning application, Planning Policy Wales Edition 6, February 2014 (PPW) confirms the requirement that planning applications 'should be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise' (Section 3.1.2). PPW 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., and that these 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 (Sections 3.1.3 and 3.1.4).

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 Highways (including access and parking)



#### 4.2 In relation to the main planning considerations:

##### 4.2.1 Principle

The assessment of this application has been difficult as it raises key issues of principle that cross over between caravan and housing policies, but also involves Site Licencing considerations which fall within the remit of the Public Protection Section.

In terms of the policy context: -

The main policy in the LDP which is relevant to the principle of housing development in towns and villages is Policy BSC1, which seeks to make provision for new housing in a range of locations, concentrating development within identified development boundaries.

Policy RD1 states that development proposals within development boundaries will be supported subject to compliance with detailed criteria.

Policy BSC3 of the local development plan sets the basic requirement for development to contribute where relevant to the provision of infrastructure including affordable housing, in line with Policy BSC4. Policy BSC4 relates specifically to affordable housing, and requires that all developments of three or more residential units provide a minimum of 10% affordable housing either on site on developments of 10 or more units, or by way of a financial contribution on developments of less than 10 units.

Policy BSC 11 requires new developments to provide open space in accordance with the County's minimum standard of 2.4 hectares per 1000 population. It states that open space should always be provided on site, and that commuted sums will only be acceptable where it is demonstrated that development would not be financially viable should the full requirement be provided on site, or where it is impractical to provide the full requirement onsite. Where there is no identified shortfall of open space in an area, the option of a commuted sum payment may be appropriate to mitigate impact on existing open space and equipment.

Chapter 9 (para 9.2.20) in Planning Policy Wales states that residential mobile homes can make a contribution to overall housing provision and have a part to play in providing low cost accommodation for small households.

Policy PSE 12 of the LDP covers chalet, static and touring caravan and camping sites. Given the authorised previous use of this site this Policy would be relevant to this case. The Policy is generally supportive of proposals involving environmental improvements of existing holiday sites by their remodelling, provision of new facilities and by landscaping provided the development is acceptable in terms of other Local Development Plan policies. The policy does not allow the change of use of a static caravan or chalet site from tourist use to residential use which is particularly relevant to the application.

In relation to the County's growth strategy, Policy BSC 1 sets out the housing contributions expected from new and existing commitments and the table of sizes suggests Plas Deva has the potential to provide 30 dwellings. Policy BSC 1 expects housing sites to provide a range of house sizes, types and tenures to reflect local need and demand with the associated affordable housing and open space provision/contributions.

This application seeks permission to change the use of a former holiday caravan site to a park home site, with units used for permanent residential occupancy.

In relation to the policies listed above, Officers interpretation is as follows:-

Housing is one of the key factors that influence people's health and well-being. Providing

opportunities for the right scale and mix of housing to meet the needs of a growing population including provision of safe and affordable housing are key considerations of the Local Development Plan. Policy BSC 1 anticipates that the application site would deliver 30 dwellings of mixed sizes, types and tenure providing affordable housing and open space in accordance with adopted policies. On a site in this location, on a main route through the village of Meliden adjacent to the AONB a high quality housing development would be expected which respects the nature and constraints of the site and provide a good quality living environment for future residents. Respectfully, it is not considered Park Home development is what was envisaged for the County's allocated housing sites, as it would not provide mixed sizes, types and tenure of properties or provide affordable housing or open space. The detailed layout of park homes for permanent residential occupancy is controlled by Model Caravan Standards and not planning policy guidance, and therefore it is not considered that the proposal would deliver the quality of development required by Policy BSC 1. There is also a potential concern here for the precedent this proposal would set for similar developments on other allocated housing sites.

In relation to Policy BSC 4, whilst the proposed park homes may contribute to housing supply there is no evidence submitted that they would provide affordable housing. Concerns have been raised by the Council's Housing Section with regards the proposal. It is acknowledged that there is a need for smaller accommodation in Denbighshire and as the site is in close proximity to Prestatyn which is a seaside town, there will be a higher percentage of older people. However the park homes proposed would not meet the identified needs as in the main they require subsidised or specialised accommodation. Housing Officers have suggested that the park homes proposed would not meet any affordable accommodation targets in Denbighshire or help towards meeting any identified social or assisted housing need. It should also be noted that the housing demand in the area for 2, 3 and 4 bed houses is high

Policy BSC 11 requires new developments to provide open space in accordance with the County's minimum standard of 2.4 hectares per 1000 population. The application proposes no on-site open space. It has been suggested within the submission that the park homes site would contain incidental open space with many trees present which would be maintained by the site operator and as the site is located within close walking distance of publicly accessible amenity space as well as adjacent footpath links the proposal complies with Policy BSC 11. Also as the site would be marketed to retired and semi-retired persons over the age of 55, no children's play space is proposed on-site.

Policy PSE 12 clearly states that the change of use of tourist sites to residential use will not be permitted. Whilst it is recognised in Planning Policy Wales (Section 9.2.20) that park homes can make a contribution to overall housing provision and have a part to play in providing low cost accommodation for small households, the proposal is considered to be contrary to the local development plan policy which restricts the use of caravan sites for permanent residential use.

Concerns have been raised by the Council's Environmental Health Officers with regards the principle of park home development, and detailed elements of the scheme

Significantly, the site is shown as a housing allocation within the Local Development Plan. The plan seeks to secure housing developments which provide a range of house sizes, types and tenures providing open space and affordable housing provision. The proposal is to locate 43 small Park homes with no open space or affordable housing provision offered. In Officer's opinion the proposal would not meet the objectives of the plan and whilst park homes may contribute to housing supply it is not considered that they offer the mix and nature of development the Council should be encouraging on sites allocated for

housing in its Local Development Plan.

#### 4.2.2 Visual 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 are matters relevant to the visual impact of development; test (vi) requires that development does not unacceptably affect prominent public views into, out of, or across any settlement or area of open countryside; test (vi) requires the incorporation of existing landscape or other features, takes account of site contours, and changes in levels and prominent skylines; and test (xiii) requires the incorporation of suitable landscaping measures to protect and enhance development in its local context.

The site lies in a prominent location off the main road through the village of Meliden, consisting of a sloping site with terraces to the rear and a number of mature trees. The proposal is to retain the existing dwelling at 113 Ffordd Talargoch and all category A and B trees.

The density of the layout is high( 39 unit/hectare), as the layout has been designed having regard to the Model Caravan Standards and the existing use of the site as a holiday caravan site for 65 units. The units themselves are single storey structures which would have limited visual impact on the area. Overall, it is considered that the proposal by virtue of the scale, design and existing screening provided by mature vegetation would not have a negative visual impact on the area. It is therefore considered acceptable in relation to the policies and guidance listed above.

#### 4.2.3 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.

There is a dwelling sited to the rear of the site and access to this is shown to be maintained as existing. This property is sited at the highest part of the site. Also to the north eastern boundary is the site of the former Meliden Garden Centre, which has full planning permission for 8 no. dwellings, therefore there are amenity issues to be taken in to account. In relation to spacing and amenity standards the submission refers to the Model Caravan Standards which have to be adhered to in order to secure a site licence. It is understood that if the proposals do not comply with the relevant standards, then the numbers/layout may change and there are controls to ensure that adequate fencing/screening is in place to protect amenities of residents.

If the application is looked at in relation to caravan legislation there would be a requirement to meet basic standards relating to protection of residential amenity, these are not the same standards that would be applied to a normal housing development.

If the application is looked at in relation to normal development control policies including Policy RD 1 relating to housing development, there would be a requirement for provision of private garden areas, adequate separation distances between dwellings, car parking, landscaping etc. The submitted layout does not demonstrate that the normal standards for housing development can be met.

Having regard to the above it is not considered that the proposal would have a negative impact on the residential amenity of existing properties close to the application site. There are however questions over the levels of privacy etc which can be achieved for future occupiers of the units which is a negative factor in the consideration of this application.

#### 4.2.4 Ecology

Local Development Plan Policy RD 1 test (iii) requires development to protect and where possible to enhance the local natural and historic environment. 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 5.2), 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.

A protected species survey has been submitted and the Biodiversity Officer has raised no objection subject to the recommendations being followed, along with the requirement to submit an updated plant species report and mitigation details for the common lizard.

The proposal is therefore considered acceptable in relation to impact on ecology subject to conditions.

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

Local Development Plan Policy RD 1 tests (vii) and (viii) oblige provision of safe and convenient access for a range of users, together with adequate parking, services and manoeuvring space; and consideration of the impact of development on the local highway network 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 (Section 8) and TAN 18 – Transport, in support of sustainable development.

The proposal is to alter the existing access by repositioning and widening and also to lower the existing stone boundary wall in part to improve visibility. Within the site the road layout will be upgraded to serve the proposed park homes and parking facilities for each park home would be provided. Standards relating to the internal road layout, parking, footpaths and pavements are set out in the Model Caravan Standards.

The Head of Highways has raised no objection to the proposal subject to the inclusion of conditions to ensure the formation of a safe and satisfactory access with adequate visibility splays.

The proposal is therefore considered acceptable in relation to impact on highway safety subject to conditions.

#### 4.2.6 Trees

Local Development Plan Policy RD 1 test (xiii) obliges developments to incorporate suitable landscaping measures which should create a visually pleasant, sustainable and biodiversity rich environment that protects and enhances existing landscape features and also creates new features and areas of open space that reflect local character and sense of place.

The site contains a number of trees, with a number of trees located to the front of the site

covered by a protection order.

The applicant has amended the proposal to ensure that all Category A and B trees which are high and moderate quality trees are retained. These trees have a high amenity value within the area and their retention is supported.

4.2.7 Other Matters

There is reference in representations to the management of another Park Homes Site nearby, Officers view is that this is not materials to the consideration of this proposal.

In relation to the retention of the existing building for site managers accommodation, no detail has been provided with the submission and in the event that planning permission is granted a condition should be imposed to ensure the building remains tied to the park home site along with details of the restoration of the building.

**5. SUMMARY AND CONCLUSIONS:**

5.1 It is considered that the principle of the proposal is unacceptable and contrary to Policy PSE 12 in the adopted Local Development Plan.

5.2 The site is shown as a housing allocation within the Local Development Plan and seeks to secure housing developments which provide a range of house sizes, types and tenures providing open space and affordable housing provision. In Officer's opinion the proposal would not meet the objectives of the plan and whilst park homes may contribute to housing supply it is not considered that they offer the mix and nature of development the Council should be encouraging on sites allocated for housing in its Local Development Plan.

**RECOMMENDATION: REFUSE** - for the following reasons:

1. It is the opinion of the Local Planning Authority that the proposal to change the use of an existing holiday caravan site to permanent residential use is unacceptable in principle, being contrary to Policy PSE 12 in the Denbighshire Local Development Plan which seeks to secure improvements to existing holiday accommodation.

2. It is the opinion of the Local Planning Authority that the proposal is contrary to Policy BSC 1 of the Denbighshire Local Development Plan and the overall strategy in relation to housing development which seeks to provide a range of house sizes, types and tenure in connection with new development. The proposal to site up to 43 park homes on an allocated housing site would not provide the mix and nature of development the Council is looking to encourage on sites allocated for housing in its Local Development Plan also contrary to Policy RD 1 in the Denbighshire Local Development Plan which relates to sustainable development and good standard design.

**NOTES TO APPLICANT:**

None