

# **DRAFT SUPPLEMENTARY PLANNING GUIDANCE:**

## **Caravans, Chalets and Camping**

**CONSULTATION REPORT June 2018**

### **1. BACKGROUND**

- 1.1 This report accompanies the draft Supplementary Planning Guidance (SPG) 'Caravans, Chalets and Camping' which will be submitted to DCC Planning Committee when considering adoption of the SPG for use in the determination of planning applications.
- 1.2 Supplementary Planning Guidance and Site Development Briefs should only be adopted by a local planning authority and, hence, regarded as a material consideration if they have been subject to comprehensive public consultation.

### **2. CONSULTATION UNDERTAKEN**

- 2.1 Consultation on the draft Supplementary Planning Guidance: Caravans, Chalets and Camping ran for 8 weeks from 30<sup>th</sup> January to 27<sup>th</sup> March 2017. This was a public consultation and was open for anyone to respond. The consultation included the following:
  - Letters / emails were sent to contacts on the LDP database; public bodies; statutory consultees; local, regional and national organisations with an interest in the LDP; plus agents /developers, registered social landlords and statutory consultees (eg NRW, WG)
  - All County Councillors notified
  - All Denbighshire City, Town & Community Councils notified, together with neighbouring Counties, Town & Community Councils

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- Town & Community Councils received copies of the consultation documents and response forms
- Local Council libraries and One-Stop-Shops also received hard copies of the consultation documents and response forms
- The draft Supplementary Planning Guidance was published on the Council's website, with electronic versions of the response form available to download
- A press release was issued before the consultation period
- A meeting with representatives of the British Holiday & Home Parks Association.

### **3. CONSULTATION RESPONSES**

- 3.1 A total of 12 written responses were received. Representations included comments from the British Holiday & Home Parks Association, Natural Resources Wales, North Wales Fire & Rescue Service, Campaign for the Protection of Rural Wales, Clwydian Range & Dee Valley AONB Joint Advisory Committee and the Canal and River Trust.
- 3.2 Copies of all responses are available from the Strategic Planning & Housing Team in Denbigh. A summary of each comment received, together with responses, are set out in the table attached.

### **4. CHANGES PROPOSED**

- 4.1 After carefully considering the comments received, Officers are recommending several changes as set out in Appendix 1. The main changes proposed include:
- Additional clarification on definitions used in the SPG
  - Additional detail around landscape impact considerations and amended measures to improve the integration of site within existing landscape features, with particular reference to the AONB
  - Amendments to reflect the condition currently being applied to planning permissions, in order to ensure the holiday use of caravans.

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Several minor amendments are also proposed in order to provide clarification and to improve the document structure.

- 4.2 Proposed changes are shown as highlighted or ~~striketrough~~ text in the attached draft SPG document.

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Name & Organisation	Summary of Representation	Council's Response	Changes Proposed
Rhys Davies  Cadnant Planning	The treatment of “log cabins, yurts, pods, tepees, shepherds huts” as chalets is too simplistic due to the variety of types and permanence of accommodation within this group. Judging these types of accommodation against the same policy considerations as static caravans will effectively introduce a blanket ban on all new alternative camping (“glamping”) accommodation. This is unjustified and such developments should instead be assessed using the policy criteria in PSE 12 for new camping and touring sites. This is supported by the similarities between touring caravan and glamping sites. The current approach in the SPG is a significant flaw and will result in a failure to support the rapidly-developing glamping industry.	The definitions within the SPG will be amended to improve clarity and alignment with LDP policies. The Council's approach is set out in LDP policy PSE 12 and cannot be altered through SPG. All LDP policies will be reviewed as part of the production of a replacement LDP.	Amend paragraph 3.3 as follows: The Council recognises the increase in the types of holiday accommodation available in recent years, particularly arising from involving new forms of static holiday accommodation and ‘glamping’ (i.e. glamorous camping), and the possibility for further new types of accommodation in the future. <del>For the purposes of this draft SPG ‘chalets’ will also include log cabins, yurts, pods, tepees, shepherd’s huts, other ‘glamping’ accommodation and other similar structures which are not expected to be moved off site when not in use (unlike a touring caravan or tent).</del> Given the lack of standard definition for these

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			types of accommodation, the Council will use the existing definitions within the Caravans and Development Control Act 1960 in determining the policy approach to be applied. Lodges, chalets, pods and other similar structures which fall within this definition will therefore be treated as static caravans. Yurts, tepees and other similar 'luxury tent' structures will normally be dealt with as camping sites under LDP policy PSE 12 'Chalet, static and touring caravan and camping sites'.
	<p>Recommend the following amendments:</p> <ul style="list-style-type: none"> <li>Para. 7.6: Unclear how the requirements of policy RD 5 apply to caravan, chalet and camping sites.</li> </ul>	Text to be amended for clarification purposes.	Amend paragraph 7.6 as follows: Applicants will normally be expected to submit a Community Linguistic Statement for tourism proposals (which includes those types of holiday

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			accommodation covered by this SPG) in villages, hamlets or open countryside.....
	<ul style="list-style-type: none"> <li>Para. 7.5: There is a palette of environmentally sensitive colours available and it would be useful to recognise this within the SPG.</li> </ul>	Agreed. Text to be amended accordingly.	Amend paragraph 7.5 as follows: Within the Clwydian Range & Dee Valley Area of Outstanding Natural Beauty (AONB), environmentally sensitive colours ( <del>e.g.</del> 'environmental green'), of which there is a palette available, should be used for new and replacement caravans.
Tony Hughes  Clwydian Range & Dee Valley AONB Joint Committee	Supports the broad thrust of the SPG in seeking to balance development with promoting rural economy and protection of the environment.	Comment noted.	No change proposed.
	Unclear at various points whether guidance applies to static caravans, chalets or both. Helpful broadening of chalets definition to include 'glamping' accommodation.	The definitions within the SPG will be amended to improve clarity and alignment with LDP policies. The Council's approach is set out in LDP	Amend paragraph 3.3 as follows: The Council recognises the increase in the types of holiday accommodation available in

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		<p>policy PSE 12 and cannot be altered through SPG. All LDP policies will be reviewed as part of the production of a replacement LDP.</p>	<p>recent years, particularly arising from involving new forms of static accommodation and 'glamping' (i.e. glamorous camping), and the possibility for further new types of accommodation in the future. <del>For the purposes of this draft SPG 'chalets' will also include log cabins, yurts, pods, tepees, shepherd's huts, other 'glamping' accommodation and other similar structures which are not expected to be moved off site when not in use (unlike a touring caravan or tent).</del> Given the lack of standard definition for these types of accommodation, the Council will use the existing definitions within the Caravans and Development Control Act 1960 in determining the policy</p>

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			approach to be applied. Lodges, chalets, pods and other similar structures which fall within this definition will therefore be treated as static caravans. Yurts, tepees and other similar 'luxury tent' structures will normally be dealt with as camping sites under LDP policy PSE 12 'Chalet, static and touring caravan and camping sites'.
	Sections on 'Development Requirements' and 'Design Guidance' are useful guidance.	Comment noted.	No change proposed.
	Para. 7.3: Suggested amendments: <ul style="list-style-type: none"> <li>Suggest adding 'This is particularly relevant for proposals within the nationally protected landscape of the AONB or its setting' after the first sentence.</li> </ul>	Agreed. Text to be amended.	Amend paragraph 7.3 as follows: The impact of sites upon the landscape will be a significant factor to which particular consideration will be given in the determination of planning applications, alongside issues of visual amenity and natural and built



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			heritage. This is particularly relevant for proposals within the nationally protected landscape of the AONB.
	<ul style="list-style-type: none"> <li>Initial bullet points should emphasise use of landscape and visual impact analysis/assessments in informing developments.</li> </ul>	Agreed. Text to be amended.	Amend paragraph 7.3 as follows: This is particularly relevant for proposals within the nationally protected landscape of the AONB or its setting. Proposals should be informed by the use of Landscape & Visual Impact Appraisal or Assessment, and the need for planning applications to be supported by such should be discussed at the pre-application stage.
	<ul style="list-style-type: none"> <li>Additional bullet point relating to careful selection of colours and materials would be useful.</li> </ul>	Agreed. Text to be amended.	Additional bullet point added to paragraph 8.5: • The use of natural materials and colour hues can help integrate buildings within rural setting.

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	<ul style="list-style-type: none"> <li>Amend bullet point 7 to include '...including proposals for management and aftercare of the site.'</li> </ul>	Agreed. Text to be amended.	Paragraph 8.5 to be amended as follows: All planning applications must be accompanied by a comprehensive landscaping scheme, including proposals for management and aftercare of the site.
	<ul style="list-style-type: none"> <li>Additional bullet point requiring developers to consider the AONB Management Plan, and conservation and enhancement of special qualities (suggested wording provided).</li> </ul>	Agreed. Text to be amended.	Additional bullet point added to paragraph 7.3: • For development within the AONB or its setting, developers should have regard to the AONB Management Plan and the need to conserve and enhance the special qualities of the protected landscape. Similar considerations apply to the Pontcysyllte Aqueduct & Canal World Heritage Site and its buffer zone.
	Para. 8.5: Suggested amendments:	Agreed. Text to be amended.	Amend paragraph 7.3 as follows: This is particularly relevant for proposals within

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	<ul style="list-style-type: none"> <li>Include an explicit requirement that landscape design should be informed by the initial landscape appraisal and site context.</li> </ul>		the nationally protected landscape of the AONB or its setting. Proposals should be informed by the use of Landscape & Visual Impact Appraisal or Assessment, and the need for planning applications to be supported by such should be discussed at the pre-application stage.
	<ul style="list-style-type: none"> <li>Clarify the need for 'locally native species' in bullet point 2.</li> </ul>	Agreed. Text to be amended.	Include bullet point in paragraph 8.5 as follows: <ul style="list-style-type: none"> <li>The use of native indigenous plant species are required to maintain rural character and support biodiversity.</li> </ul>
	<ul style="list-style-type: none"> <li>Include additional bullet point to remind developers/decision makers of the need to conserve and enhance existing landscape features.</li> </ul>	Agreed. Text to be amended.	Amend paragraph 8.5 as follows: Landscape proposals will be required to demonstrate how the development would be integrated within its setting, and conserves and enhances existing landscape features.

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	<ul style="list-style-type: none"> <li>Include additional reference in bullet point 5 regarding light spillage, illumination levels and maximum colour temperature.</li> </ul>	<p>Agreed. Text to be amended. The SPG will apply county-wide to both urban and rural locations, and it is not considered appropriate to apply a maximum colour temperature to all proposals.</p>	<p>Amend paragraph 8.5 as follows: ‘...low intensity illumination which incorporates baffles and/or are directed to avoid the upwards spillage of light. Illumination levels should be the minimum necessary to meet the needs of the location. Planning applications should be accompanied by a lighting scheme that demonstrates sensitivity to the location and provides details of measures to minimise light pollution, including the colour temperature of proposed lighting units.</p>

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	Support for the prevention of permanent occupation of holiday accommodation and the principle of extending the tourist season but the value of 10–11 month occupancy conditions should not be discounted particularly where sites are likely to be more visible in winter.	The controls provided by the planning and licensing regimes in combination are considered sufficient to prevent the year-round occupancy of holiday accommodation, without applying a seasonal restriction. The wording of a condition currently being applied to restrict residential occupancy is included at paragraph 9.1 of the draft SPG. The visual impact of proposed new sites will be assessed as part of any planning application.	No change proposed.
Tim Bettany-Simmons	Support the production of the draft SPG and have no specific comments to make.	Comment noted.	No change proposed.
Canal & River Trust / Glandwr Cymru	Document makes reference to policies which allow for development within the Pontcysyllte Aqueduct and Canal World Heritage Site.	Comment noted.	No change proposed.

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Sandra Parry	Those living in caravans and mobile homes should and must pay council tax as they are accessing services for free.	The SPG applies only to applications for planning permission for caravans, chalets and camping sites. Issues relating to residential occupation of such sites is outside the scope of the SPG and are being addressed through other Council projects.	No change proposed.
Steve Whipp	Support the draft document as being very helpful for both strategic support of national policies and guidance at a local level.	Comment noted.	No change proposed.
	Recommend including reference to statutes and regulations e.g. building regulations, utility connections, safety regulations etc. and how these should be implemented. Reference to Caravan Club guidelines for the design and operation of sites would be helpful.	The SPG applies only to applications for planning permission for caravans, chalets and camping sites. Other regulatory regimes and requirements are outside the scope of the SPG and may be subject to amendment, resulting in any references	No change proposed.

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		within the SPG becoming outdated.	
	Recommend including a framework on how licensing and audit activities would take place, and actions to address sites that no longer comply with planning guidance. Particular reference should be included to accommodation no longer fit for habitation or have become visually harmful and how these will be dealt with.	The SPG applies only to applications for planning permission for caravans, chalets and camping sites. Where non-compliance of permission has occurred, this can be addressed through enforcement action. Other issues are outside the scope of this SPG.	No change proposed.
	Disposal of old static caravans is an issue, particularly abandonment and the resultant visual harm.	The SPG applies only to applications for planning permission for caravans, chalets and camping sites. Issues relating to disposal of caravans is outside the scope of the SPG.	No change proposed.
Darren Millar AM/AC	Support the guidance and particularly welcome section 9 of the document in addressing concerns over abuse of holiday use.	Comment noted.	No change proposed.

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	Recommend including a presumption against 12 month occupancy in order to further discourage the use of holiday accommodation as main residences.	The controls provided by the planning and licensing regimes in combination are considered sufficient to prevent the year-round occupancy of holiday accommodation, without applying a seasonal restriction. The wording of a condition currently being applied to restrict residential occupancy is included at paragraph 9.1 of the draft SPG.	No change proposed.
M.W. Moriarty  Campaign for the Protection of Rural Wales / Ymgyrch Diogelu Cymru Wledig	Recommend the following amendments: <ul style="list-style-type: none"> <li>• Para. 3.2: Include a sentence referring to the protection afforded to areas of higher scenic value and the coast (suggested wording provided).</li> </ul>	Agreed. Text to be amended.	Amend paragraph 3.2 as follows: <del>The protection of the quality of the environment will be a primary consideration when assessing proposals, as will potential impacts on highways and the local community.</del> There can be a greater demand for such development in areas of higher scenic value and the coast. Protection of the



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			quality and value of these areas, along with nature conservation and the historic environment will be a primary consideration when assessing proposals, as also potential impacts on highways and the local community.
	<ul style="list-style-type: none"> <li>Para. 6.3 &amp; 7.1: Conflict around wording relating to new static caravan sites.</li> </ul>	Agreed. Text to be amended.	Amend paragraph 7.1 as follows: Proposals for any new or extended caravan ( <del>static and touring</del> ), chalet and camping sites must address the following requirements:
	<ul style="list-style-type: none"> <li>Para. 8.1: Minimum separation distance of 6m, including awnings, should be applied in accordance with Camping and Caravan Club regulations.</li> </ul>	The minimum separation distances included within the SPG are in accordance with the caravan site licensing conditions normally applied by Denbighshire County Council.	No change proposed.
	<ul style="list-style-type: none"> <li>Para. 8.5: Include additional sentence requiring cabling connections to be laid underground and not overhead (suggested</li> </ul>	It is considered unnecessary to require all proposals in all areas of the county to provide underground cabling. The SPG	No change proposed.

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	wording provided).	highlights the importance of addressing visual and landscape issues at various points throughout the document, which would include those arising from overhead cabling.	
Gwyn Jones	Residential mobile homes can make a contribution to housing provision and can provide low cost accommodation for small households. LDP policy and SPG should be amended to comply with Planning Policy Wales Chapter 9 (para. 9.2.20) for residential parks. Lodges could be offered as affordable homes and are built to a high standard.	The SPG applies only to applications for planning permission for caravans, chalets and camping sites for holiday use. The use of such structures for permanent residential use, whether market or affordable, is outside the scope of this SPG.	No change proposed.
Angharad Wyn Crump	Support for the emphasis on guidance within the authority's rural and coastal landscapes.	Comment noted.	No change proposed.
Natural Resources Wales / Cyfoeth	Need for landscape surveys and assessments should be discussed at pre-application consultation stage with the LPA and NRW. Landscape and Visual Appraisal	Agreed. Text to be amended accordingly.	Amend paragraph 7.3 as follows: This is particularly relevant for proposals within the nationally protected

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Naturioli Cymru	should be undertaken to inform planning proposals, with a full Landscape and Visual Impact Assessment where significant effects may occur.		landscape of the AONB or its setting. Proposals should be informed by the use of Landscape & Visual Impact Appraisal or Assessment, and the need for planning applications to be supported by such should be discussed at the pre-application stage.
	<p>Recommend the following amendments:</p> <ul style="list-style-type: none"> <li>Para. 7.3: Strengthen scope of the opening paragraph regarding landscape and heritage (suggested wording provided).</li> </ul>	Agreed. Text to be amended accordingly.	Amend paragraph 7.3 as follows: The impact of sites upon the landscape will be a significant factor to which particular consideration will be given in the determination of planning applications, alongside issues of visual amenity and natural and built heritage. This is particularly relevant for proposals within the nationally protected landscape of the AONB or its setting.

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	<ul style="list-style-type: none"> <li>Section 8: Amalgamate with site choice considerations set out in paragraph 7.3 and amend title to 'Site Planning and Design Guidance' (suggested wording provided).</li> </ul>	It is recognised there are some overlapping issues but it is considered helpful for users of the SPG to maintain a distinction between section 7 (general site development requirements) and section 8 (more detailed design and layout considerations).	No change proposed.
	<ul style="list-style-type: none"> <li>Para. 8.1: The purpose of a '3m wide area kept clear within the inside of all boundaries' is unclear.</li> </ul>	This requirement within the SPG is in accordance with the caravan site licensing conditions normally applied by Denbighshire County Council.	No change proposed.
	<ul style="list-style-type: none"> <li>Para. 8.1: Include additional sentence regarding possible need for space for groups of tree planting (suggested wording provided).</li> </ul>	In addition to minimum separation distances, proposals must take into account the space required by various site requirements including roads, paths, parking, landscaping, buildings etc. It is not considered necessary to refer specifically to tree planting, and landscaping proposals and site	No change proposed.

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		design and addressed elsewhere in the SPG.	
	<ul style="list-style-type: none"> <li>Para. 8.2: Limit of 10 units per cluster guide layout without considering all issues. Recommend setting out a range of parameters to guide development, covering layout, parking, internal roads, treatments and lighting (suggested wording provided).</li> </ul>	Agreed. Text to be amended to remove reference to a limit of 10 units per cluster. It is considered that the range of parameters suggested are addressed at various points throughout the SPG.	Amend paragraph 8.2 as follows: As part of the overall landscaping and layout of large sites, the site should be broken up into smaller clusters. <del>of no more than 10 units in each cluster.</del>
	<ul style="list-style-type: none"> <li>Para. 8.5: Suggest renaming to 'Landscape Proposals' and amending paragraph to cover a wider range of considerations, than just earthworks and planting, including use of landform, native plant species, new planting and boundary treatments, hard landscaping, use of natural materials and management plan (suggested wording provided).</li> </ul>	Agreed. Text to be amended.	Amend paragraph 8.5 as follows: <b>Landscaping Landscape Proposals</b> <del>The Council will place significant emphasis on achieving high quality hard and soft landscaping, which will help to integrate the development into its setting. Proposals should have regard to the following:</del> <del>→ Applicants will be expected to submit a scheme of landscaping as part of the</del>

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			<p>application. The landscaping should be submitted as an integrated scheme for the entire site;</p> <ul style="list-style-type: none"> <li>• Soft landscaping should focus on native species, and take into account the cover to be provided throughout the seasons, as well as the species and cover adjacent to the site. The use of fast growing conifers will not be acceptable;</li> <li>• In assessing screening of any proposed sites, it will be necessary to consider whether the operator of the proposed site will have control over the woodland which provides the screening, in order to avoid a situation where a site might later be exposed to view due to felling operations by the adjoining landowner;</li> </ul>

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			<p> <del>• Hard surfacing should be kept to an absolute minimum and should generally be limited to access roads, footpaths and car parking;</del>  <del>• Lighting should generally be kept to a minimum and where required should be designed so as to minimise light pollution by utilising low level, low intensity illumination.</del> </p> <p> Landscape proposals will be required to demonstrate how the development would be integrated within its setting, and conserves and enhances existing landscape features. They should be developed in response to the landscape and visual analysis of the site and in conjunction with planning and design of the development </p>

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			<p>as part of an integrated proposal. All planning applications must be accompanied by a comprehensive landscaping scheme, including proposals for management and aftercare of the site. Proposals should have regard to the following:</p> <ul style="list-style-type: none"> <li>• Set out any changes to landform, the use of retaining structures and how these will be naturalised – generally only very minor reshaping of hillside sites should be considered due to the difficulties in naturalising bare ground, steep slopes and thin soils;</li> <li>• The use of native indigenous plant species are required to maintain rural character and support biodiversity. Scots pine,</li> </ul>



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			<p>Corsican pine, Yew and Holly, may be appropriate for adding some evergreen cover into the planting mix. Fast growing conifers will not be acceptable;</p> <ul style="list-style-type: none"> <li>• Planting, protection, establishment and maintenance specification for new planting will be required;</li> <li>• New boundaries should have regard to the local vernacular traditions e.g. hedgerows, dry stone walls etc;</li> <li>• Finishes to hard landscape components will be specified including roads, paths and retaining structures;</li> <li>• The use of natural materials and colour hues can help integrate buildings within rural settings;</li> <li>• A management plan for existing hedgerows, trees and</li> </ul>

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			<p>woodland within the ownership of the applicant would be required where these are important to the character and integration of the development (normally 25 years of for the lifetime of the development);</p> <ul style="list-style-type: none"> <li>• Lighting should generally be kept to a minimum and where required should be designed so as to minimise light pollution by utilising low level, low intensity illumination which incorporates baffles and/or are directed to avoid the upwards spillage of light. Illumination levels should be the minimum necessary to meet the needs of the location. Planning applications should be accompanied by a lighting</li> </ul>

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			scheme that demonstrates sensitivity to the location and provides details of measures to minimise light pollution, including the colour temperature of proposed lighting units.
Paul Jenkinson	Welcome the planning guidance, particularly paragraphs 9.1 and 9.3.	Comment noted.	No change proposed.
North Wales Fire & Rescue Service	Recommend including reference to Model Standards (1983 & 1989) for caravan sites, outlining minimum spacing and density requirements. Caravans are often too close and in breach of the standards, causing potential fire safety problems. Developers should be made aware of the need to comply and the earliest opportunity.	Agreed. Text to be amended accordingly.	Amend paragraph 8.1 as follows: Site density and separation distances between caravans will be specified through site licence conditions and <del>should</del> will be consistent with the Model Standards (1983 and 1989) for caravan sites, safety standards and health and amenity requirements.
Eirwen Godden	Welcome the contents of the document as an excellent guide to encouraging tourism in the area.	Comment noted.	No change proposed.

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Llanfair Dyffryn Clwyd Community Council / Cyngor Cymuned			
David Middleton  British Holiday & Home Parks Association	Suggest including the following definition of 'holiday' to provide clarity: " <i>A period of recreation away from your main residence when no work is done</i> ", in line with legal definitions and that relied upon in planning appeals.	Agreed. Text to be amended accordingly.	Amend paragraph 3.4 as follows: The purpose of this SPG is to provide guidance on proposals for caravan, chalet and camping sites as holiday accommodation. For clarification, a 'holiday' is defined as a period of recreation away from your main residence when no work is done.
	Recommend the following amendments: <ul style="list-style-type: none"> <li>Para. 6.3: A blanket ban on all new caravan parks is not an acceptable policy framework. Would this prevent new sites of high quality timber 'lodges', caravans and</li> </ul>	Resisting the development of new static caravan sites is the approach set out in LDP policy PSE 12 and this cannot be altered through SPG. Timber lodges etc will be treated as	No change proposed.

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	chalets?	static caravans should they fall within the legal definition of a 'caravan'.	
	<ul style="list-style-type: none"> <li>Para. 7.5: There is palette of environmental colours available and this should be recognised within the SPG.</li> </ul>	Agreed. Text to be amended accordingly.	Amend paragraph 7.5 as follows: Within the Clwydian Range & Dee Valley Area of Outstanding Natural Beauty (AONB), environmentally sensitive colours (e.g. 'environmental green'), of which there is a palette available, should be used for new and replacement caravans.
	<ul style="list-style-type: none"> <li>Para. 7.6: It is not clear whether the requirement for Community &amp; Linguistic Impact Statements /Assessments apply to caravan development. Query whether it is necessary to place such a requirement on holiday caravan parks.</li> </ul>	Text to be amended for clarification purposes. LDP policy RD 5 sets out the requirements for Community & Linguistic Impact Assessment, and cannot be altered through SPG. All LDP policies will be reviewed as part of the	Amend paragraph 7.6 as follows: Applicants will normally be expected to submit a Community Linguistic Statement for tourism proposals (which includes those types of holiday accommodation covered by

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		production of a replacement LDP.	this SPG) in villages, hamlets or open countryside.....
	<ul style="list-style-type: none"> <li>Para. 9.1: Caravan owner's movements cannot be monitored, therefore requiring a register to be kept of arrival and departure dates would be unworkable. This part of the suggested condition is unenforceable. Suggest an alternative condition (<i>wording provided</i>). Asking holidaymakers for Council Tax records is unduly burdensome on park operators and utility bills should suffice.</li> </ul>	The Council is committed to preventing the unauthorised permanent residential occupation of holiday units and attaching a condition to support this is necessary. Requiring evidence of council tax demands is considered to be no more onerous than requiring utility bills. The wording of the condition is to be amended in the SPG to reflect that currently being used.	<p>Amend paragraph 9.1 as follows: <i>'An up-to-date register shall be kept of the names of all the occupiers of the [STATE static caravans/chalets/lodges], their main home addresses, and the date of their arrival and departure from the accommodation. The register shall be made available for inspection on request by the Local Planning Authority.'</i></p> <p><i>'The caravan site license holder or his/her nominated person(s) shall maintain an up-to-date register of the names(s) and principal address(es) of the owner(s) and the principal occupier(s) of each holiday unit on the site. The register shall also contain</i></p>

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Name & Organisation	Summary of Representation	Council's Response	Changes Proposed
			<p><i>copies of up-to-date council tax demands pertaining to each principal address given. The register shall be made available for inspection by Officers of the Local Planning Authority at all reasonable times.</i></p> <p><i>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.'</i></p>
	<ul style="list-style-type: none"> <li>• Para. 9.3: There are circumstances where replacing touring caravans with static can bring about significant environmental improvements, reduce numbers and improve sustainability. This policy</li> </ul>	<p>Preventing the replacement of touring caravans with static caravans is set out in LDP policy PSE 12 and cannot be altered through SPG. Policy PSE 12 makes provision for proposals</p>	<p>No change proposed.</p>

## APPENDIX 1

Name & Organisation	Summary of Representation	Council's Response	Changes Proposed
	approach should be allowed through the next Local Development Plan review.	relating to the environmental improvement of existing. All LDP policies will be reviewed as part of the production of a replacement LDP.	