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01/2018/0705

Scale: 1:10000

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PROPOSED SITE LAYOUT PLAN

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Client: **MR. R. WYLLIE**

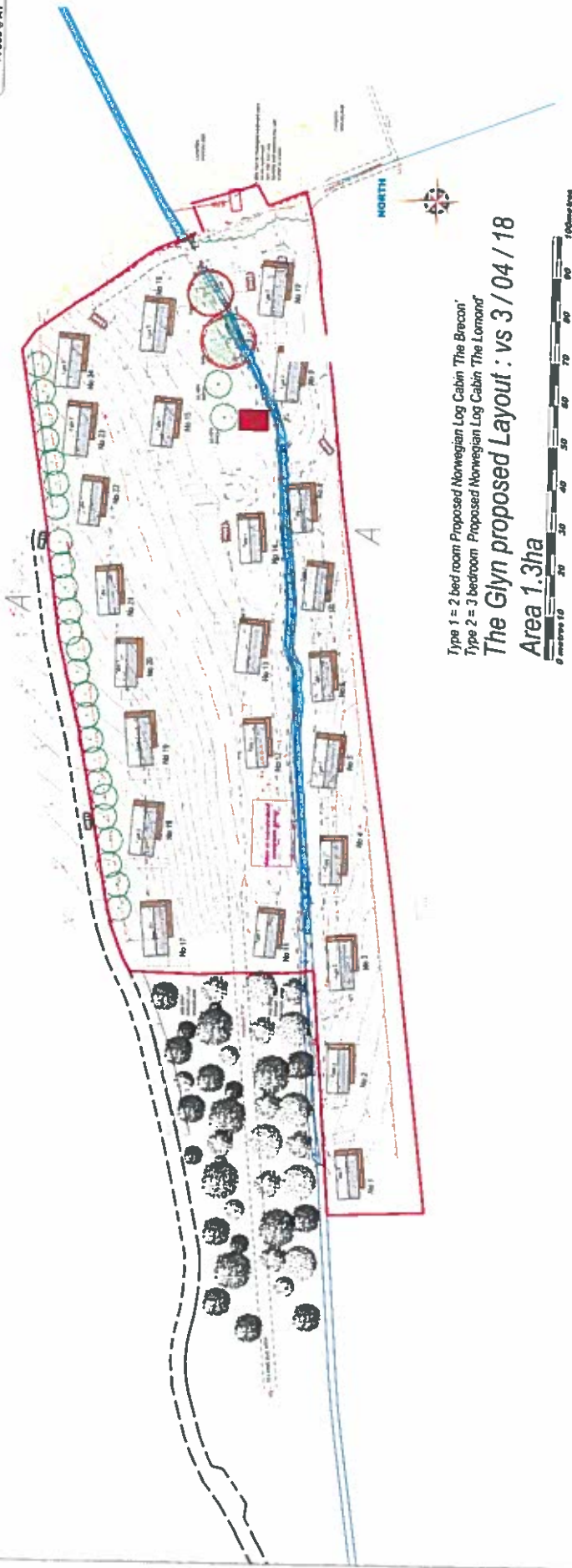
Project: **THE GLYN,
 LLEWELI PARK AIRFIELD,
 DENBIGH.**

Subject: **SITE PLAN.**

Drawn by: **RBS**
 Checked by: **DL**
 Date: **APR 2018**

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 Checked by: **DL**
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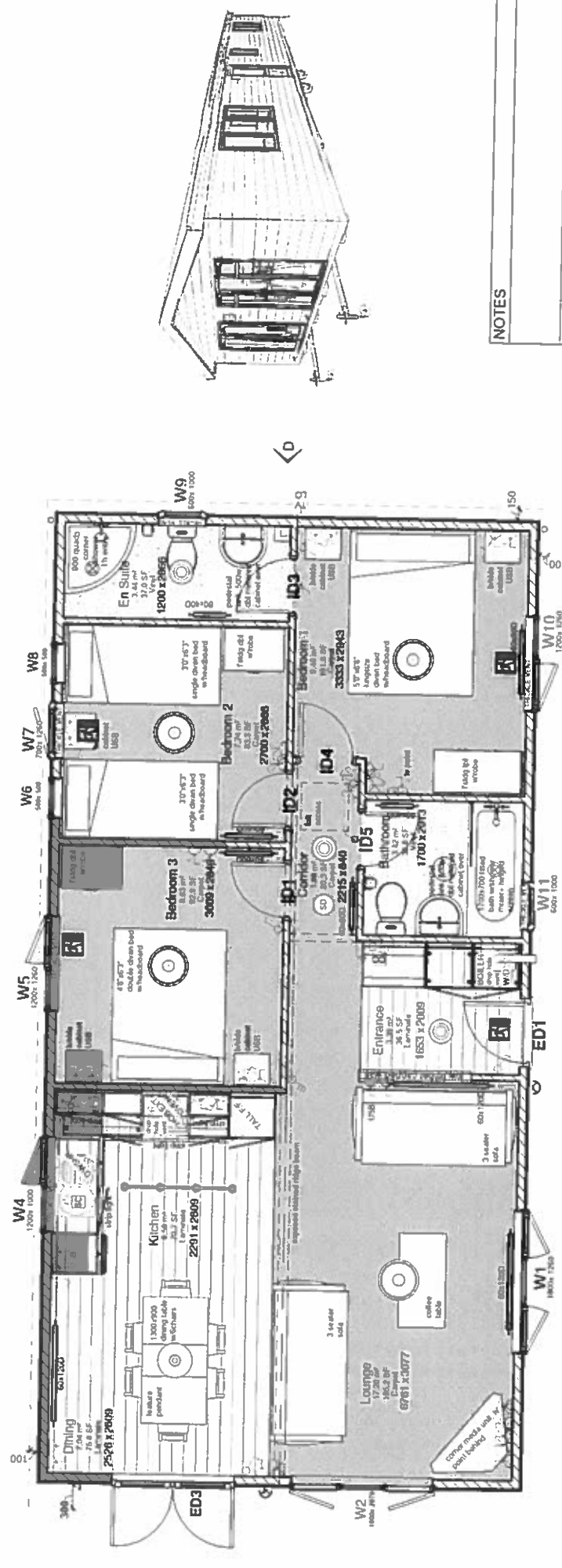
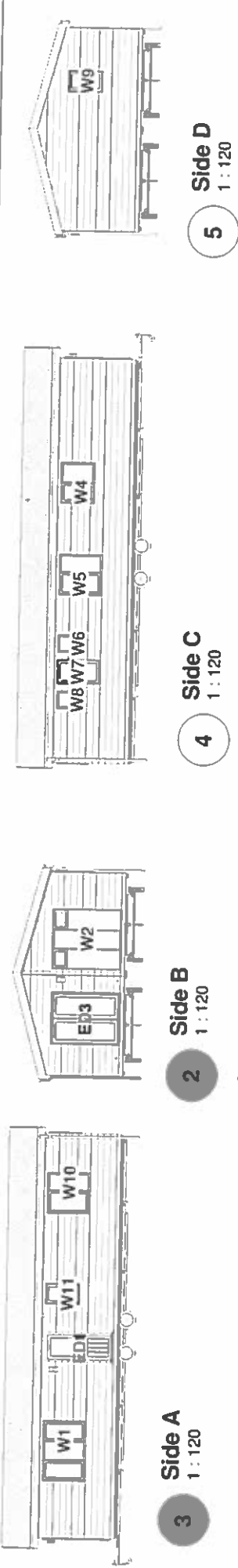
Scale: **1:500 @ A1**



Type 1 = 2 bed room Proposed Norwegian Log Cabin 'The Brecon'
 Type 2 = 3 bedroom Proposed Norwegian Log Cabin 'The Lomond'
The Glyn proposed Layout : vs 3 / 04 / 18
Area 1.3ha

TYPICAL LODGE DETAIL

12/10/2017 09:14:21



Rev	Description	Date

NOTES

DESIGNED IN ACCORDANCE WITH BS3632 : 2015

Drawing Ref.
VERITY TWIN 40 20 3B 01

Issue
DRAFT

Rev
P01

Client
CANEXEL METROITILE

Date Drawn
11 10 17

Drawn
Checked

Cladding
Roofing

Chassis No

Chassis Site Name
12192 L 3048

Chassis Site Class
12192 L 3048

Chassis Finish
PART COATED

Client	Date Drawn	Drawn	Checked

Overall External Dimensions LxWxH (mm)
12250 x 6154 x 3979

Model
Verity 3 bed

Client Approved [print name & sign]

Legend	Symbol	Item
ED	⌬	Entrance
W	□	Window
B	⊠	Bathroom
BR	⊠	Bedroom
K	⊠	Kitchen
D	⊠	Dining
L	⊠	Lounge
ES	⊠	En Suite
CO	⊠	CO Detector
S	⊠	Socket
IS	⊠	Isolator Switch
LS	⊠	Light Switch
TC	⊠	TV Coax Cable
T	⊠	Thermostat
E	⊠	Emergency Exit

VISUAL SCALE 1:50 @ A3

TYPICAL LODGE DETAIL



WARD : Denbigh Lower

WARD MEMBERS: Cllr Rhys Thomas
Cllr Mark Young (c)

APPLICATION NO: 01/2018/0705/ PF

PROPOSAL: Development of 1.3 ha of land by the siting of 24 accommodation lodges and associated works

LOCATION: The Glyn Lleweni Parc Mold Road Denbigh

APPLICANT: Mr Rodney Witter Lleweni Parc Ltd

CONSTRAINTS: None

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 due to significant number of public representations being received.

CONSULTATION RESPONSES:
DENBIGH TOWN COUNCIL:

Original comments:

"Following on from our Planning meeting this evening, the town councillors are objecting to the whole application based on the following - 01/2018/0705

The Glyn, Lleweni Parc, Mold Road, Denbigh

- a. Water supply, the adequacy needs to be researched.
- b. Doesn't adhere to the local development plan policy PSE10
- c. Whether the proposed development would be sufficiently accessible."

Re-consultation comments:

None received at the time of writing this report

ABERWHEELER COMMUNITY COUNCIL:

Original comments:

"At our recent meeting Aberwheeler Community Councils made the following comments :-

1. Sewage and soakaway water could cause pollution to the River Clwyd .
2. Increase usage of the road track from the A541, causing problems for residents living in Lleweni Barns.
3. Lodges should not be occupied for full 12 months.
4. Concerned with the safety of increased air traffic above Aberwheeler .
5. Does not adhere to the LDP policy PSE10."

Re-consultation comments:

None received at the time of writing this report

BODFARI COMMUNITY COUNCIL:

Original comments:

"With regard to the planning application 01/2018/0705 to develop 1.3Ha of land at The Glyn, Lleweni Park, Mold Road, Denbigh by the siting of 24 accommodation lodges and associated works,

Bodfari Community Council recommends refusal of this application as the plans submitted do not address the issues raised in the pre-application consultation requesting heritage, conservation and wildlife surveys, consideration of how wildlife would be impacted by light pollution and consideration of the effect on public transport links, safe site access and footpath access in the light of the proposed increase in use.

Furthermore consideration needs to be made to the effect of the increased pressure on the borehole water supply and access road.

The lodges proposed are also disproportionately large for the potential use, will be visible from the Clwydian range and will contribute to the urbanisation of the landscape."

Re-consultation comments:

None received at the time of writing this report

TREFNANT COMMUNITY COUNCIL:

Original comments:

"Trefnant Community Council have the following comments to make:

1. The Application is contrary to Denbighshire County Councils Local Development Plan.
2. A previous Application for 20 lodges in 2011 was rejected after a Public Hearing by the Welsh Government. The Council can see no exceptional circumstances that have occurred since that date which would allow for an even bigger development to be approved.
3. The proposed site is in a rural landscape with open green spaces.
4. The area was mixed woodland. Did the applicant seek permission and carry out a wildlife survey before clearing the site?
5. Timber Lodges have a limited life span before they need replacing. There is concern that in a number of years, when they start to deteriorate, an application would be made for more permanent structures."

Re-consultation comments:

None received at the time of writing this report

NATURAL RESOURCES WALES:

Original comments:

Raised significant concerns with the proposal with respect to Great Crested Newts (GCN) and advised further survey of pond no. 2 was required.

Should planning permission be granted, NRW recommend conditions are required to ensure details of external light spillage scheme, otter reasonable avoidance measures scheme and a biosecurity risk assessment are submitted and approved in writing before development is permitted to commence.

Re-consultation comments:

No objections in relation to the favourable conservation status of Great Crested Newts following the receipt of additional information.

WELSH GOVERNMENT – LAND, NATURE AND FORESTRY DIVISION

Response is made in accordance with Technical Advice Note 6, Annex B6 and relates to technical information only; not the merits or otherwise of the proposal.

1. Agricultural Land Classification (ALC) Information

The Department does not hold detailed ALC survey information for the site. The Predictive ALC Map for Wales notes the land is predicted to be ALC Subgrade 3b.

2. Advice

The Department does not recommend commissioning an ALC survey.

Best and Most Versatile Land (BMV) Policy is unlikely to be an issue in this case (PPW 4.10.1)

WELSH HISTORIC GARDEN TRUST:

Object to the proposed development in relation to principle/need, impact on landscape character, historic environment, ecology and traffic/accessibility. It is contrary to Planning Policy Wales and Denbighshire's LDP and an unnecessary development.

DWR CYMRU / WELSH WATER:

No objection

DENBIGHSHIRE COUNTY COUNCIL CONSULTEES –

HIGHWAYS OFFICER:

No objection.

In terms of the existing junction at the A543, Highways Officers consider this adequate and of suitable design and visibility to accommodate further vehicle movements from the site.

In terms of offering alternative modes of transport from the site, this is not ideal for walking and cycling along the A543 to Denbigh as there is no footway or designated cycle paths along this route. There is a bus route along the A543 which stops at the junction of Lleweni Parc every two hours throughout the day but this is a limited service. The local and surrounding rights of way network can be accessible from the site and Denbigh town can be accessed via this system. Most of the occupiers are likely to be reliant on the private car which is not deemed to be unsafe given the good immediate links to the existing highway network.

Although the site in terms of sustainability is not ideal, that there would be no highway safety related issues arising from the proposal.

Sustrans comments (submitted as an appendix to Highway Officer response):

Sustrans confirm there are no cycling routes linking to the site and consider the A543 is unsuitable for official cycling routes (be they active travel or leisure) due to the speeds of traffic (and probably also vehicle numbers) and there are no footways along the road either. A dedicated shared use path along that route would be useful.

There is a stone track between Kilford Farm and Pontruffydd Hall Farm which could be utilised for cycle use, but at present it is only a dedicated footpath and so the right of way status would need to be amended. Ideally the track should be upgraded to make it more suitable for walking/cycling. Sustrans do not think this development connects directly to that track, but a link is possible and easier than a new route alongside the A543. It would also need a short section of path between Kilford Farm and the Brookhouse area along the Whitchurch Road.

PUBLIC PROTECTION OFFICER:

No objection subject to a condition to ensure the new bore hole is not within 50m of any existing or proposed foul drainage system

ECOLOGY OFFICER:

Original comments:

Additional information is required, a further survey of pond 2 should be undertaken to determine the presence/likely absence of great crested newts at the application site.

Re-consultation comments:

Awaiting response

STRATEGIC PLANNING AND HOUSING OFFICER:

Denbighshire's Local Development Plan Policy PSE 12 'Chalet, static and touring caravan and camping sites' states that proposals for new static caravan sites will not be permitted. The Council's Supplementary Planning Guidance 'Caravans, Chalets & Camping' provides further detail and clarification. Paragraph 3.3 of the SPG recognises the variety of types of holiday accommodation and that these will be judged against the standard definition of a caravan as set out in the Caravans and Development Control Act 1960. The lodges proposed have been confirmed as falling within this definition and the proposal is therefore unacceptable in principle.

Policy PSE 5 'Rural economy' provides general support for employment, commercial and tourism developments in rural areas, and policy PSE 14 'Outdoor activity tourism' supports proposals that expand the outdoor activity sector in the county. However, neither policy makes reference to proposals for new caravan sites as this is specifically addressed under Policy PSE 12. It is also considered that insufficient evidence has been provided to meet the criteria under policies PSE 5 and 14.

FLOOD RISK MANAGER:

No objection subject to a condition requiring the submission of detailed surface water drainage details.

RESPONSE TO PUBLICITY:

In objection

Representations received from:

Michael Skuse, Campaign for the Protection of Rural Wales
D. MacLennan, The West House, Lleweni
Paul and Christine Smith, 2 The East Wing, Lleweni, Denbigh
Nerys A Edwards, 3 The Hay Barn, Lleweni
Vicky Poole & Susie Lunt, East Stable, Lleweni
A Jones, The Hay Barn, Lleweni
Jason Kenyon, East Pavilion, Lleweni, Denbigh
H Jones, 1 The West Wing, Lleweni, Dinbych
Miss C G Roberts and Mr Dewi Jones, 1 The Hay Barn, Lleweni
Mrs K Coppin, 2 The Corn Barn, Lleweni, Denbigh
J.A. & K. Roberts, 2, The Hay Barn, Lleweni, Mold Rd. Denbigh
J. Winstanley, 1, The East Wing, Lleweni, Mold Road, Denbigh
Gareth Edwards, 3 The Hay Barn, Lleweni, Mold Road

Summary of planning based representations in objection:

Pre-Application Consultation:

Does not fully reflect pre-application consultation responses

Principle

- Same principle as previously refused scheme at the site – no material changes since scheme was refused.
- Supporting information refers to out of date UDP policies rather than LDP.

- Proposed lodges meet the legal definition of static caravans – LDP does not permit new static sites / does not comply with LDP policy
- Previous proposals for single caravans / lodges at Lleweni Parc have been refused.

Location

- Greenfield site / Loss of agricultural land.
- No amenities (shops, pubs etc) in close to the site.
- Unsustainable location.

Need / justification for the development:

- PSE5 states need for business plan – None provided.
- Financial viability – existing activities at Lleweni Parc deliver marginal financial viability – application claims proposal would underpin operations at site, but has not demonstrated this or provided a business plan.
- Reference to sale of the lodges in supporting information - would be privately owned and not available for rental / suggestion of subletting.
- Not clear if this accommodation is intended for gliding club only, or if it would be open to general public.
- No evidence it would contribute to local economic prosperity and local community / only financially benefit to Lleweni Parc site
- Only proposing to create two additional jobs..
- No evidence provided that there is a need for this type of development in this location – existing accommodation in area includes touring site at Lleweni Park and further two caravan parks in Denbigh and Bodfari and consented large lodge development at Bryn Morfydd, Llanrhaeadr.
- Emphasis in supporting information is that glider users would use chalets, however site has only 6 gliders at any one time – there is other accommodation onsite at Lleweni Parc which could be utilised instead / Gliding is intermittent and seasonal, small niche sector and is not available to a wide range of potential visitors, so number of glider visitors to site is limited and does not warrant development of scale proposed / unlikely they will bring much tourism business to Denbigh.
- Other gliding clubs in UK do not seem to offer onsite accommodation - many promote local accommodation in wider area to support local economy.
- Plenty of existing local accommodation within 6 miles radius which can support the needs of the gliding club.

Use / control of occupancy

- Concern that proposal units could be used year round and be used as permanent dwellings, which would strain local services.
- Should the scheme go ahead, complete closure of site for at least 2 months must be considered as a minimum.
- No information on how occupancy would be policed in the documents.

Design / scale / layout / Visual impact

- Design / Scale / density of development – large scale development in context of location / 24 cabins would be in close proximity, together with parking and associated development, site would become overcrowded, unsightly and dangerous.
- Urban layout with regimented lines of many ‘caravan’ types – no attempt to blend it into the rural environment or provide adequate screening.
- Out of character with surrounding landscape, which is of local historic importance / change the natural setting of the environment
- Would be out of scale / dominate Lleweni hamlet (number of lodges would be greater than number of houses)
- Cumulative impact - proposal, together with existing touring site will dominate historic environs of Lleweni.
- Design / appearance of caravans (artificially clad caravans), will not assimilate into landscape / materials would not enhance visual amenity.
- Steep gradient –earthworks will be required to create flat ground for cabins to rest on and application states steps or ramparts to access each cabin will be created.

- Associated development (driveway, parking, grid connection) will damage visual amenity.
- Not well screened from dwellings at Lleweni
- Existing surrounding woodland would not screen site - no additional screening proposed to minimise visual impact.
- Development creep at Lleweni Parc eroding the tranquil setting, already has a touring caravan site and this would be further development at the site.
- Historic hamlet of Lleweni should be kept as a tranquil and peaceful riverside location.
- Affect views from Clwydian Way
- Lack of specific information on size, siting, utility provision, positioning and provision of lighting, services, bin store etc.
- Light pollution having a detrimental impact on tranquil rural setting / dark sky environment.

Historic environment / Setting of listed buildings

- Lleweni hamlet contains a number of traditionally built dwellings and a number of listed buildings. Does not contribute or complement them, and would not enhance setting of Listed Buildings close by.
- Does not comply with Listed Buildings SPG.

Residential amenity

- Detrimental to amenity of private dwellings at Lleweni.
- Noise and disturbance during construction (e.g. groundworks and excavations for foul water drainage).
- Development creep at Lleweni having detrimental impact on amenity of neighbouring residential properties.
- Dogs / visitors staying in cabins causing noise / disruption.
- Local residents already experience noise and disturbance from existing touring caravan site at Lleweni – proposal will lead to additional noise and disturbance.
- Would be clearly visible from Lleweni residential properties.
- Light pollution from proposal.
- Proposed development could be accessed at unsocial hours.
- 24 units would accommodate up to 60 holiday makers – create disturbance to local residents.

Ecological impact

- Land has been cleared of woodland to create 'The Glyn', not a natural clearing. Clearance works already carried out has changed topography and natural drainage of site / damaged habitat.
- Proposal will be detrimental to ecology.

Flooding / Drainage

- Woodland clearance has changed land drainage.
- Watercourse through the site / part of the floodplain – site is at risk of flooding.
- Lack of information about foul water drainage.
- Development would increase runoff into river.

Access / Traffic / road safety

- Site is accessed via private road - increased use degrade road and would be unreasonable to expect private residents to pay for the upkeep.
- Site does not have good accessibility to local highway as it's accessed via a private lane.
- No footpaths or cyclepaths serving the site, and no footpath along the public highway into Denbigh.
- Would Increase traffic to and from the site, on top of existing traffic visiting Lleweni site and tourer caravan site.
- Footpath to Kilford Farm on Whitchurch Road not suitable as there are no footpaths along Whitchurch Road into Denbigh – this footpath route is too far from Denbigh to expect visitors to walk.

- Proposed access point at a dangerous point off the private road, on a bend in the road with poor visibility and often blocked by parked cars.
- Poor public transport.
- Risk of congestion if traffic is stopped whilst airfield is in use.
- Concern for access of emergency vehicles to site and Lleweni hamlet.
- Not feasible to suggest visitors would use public transport
- No bus stop at entrance to Lleweni (bus stop is a request only stop).
- Junctions not safe.
- Private lane is un-light – safety concerns as proposal would increase traffic in evenings / night.
- Proposal is suggesting access would be via a locked gate for security, but this would stop emergency vehicle access.

Health and Safety

- Communal open space proposed is close to watercourse – unsafe for children.
- Proximity to airfield runway (less than 500m away) – how will area be safe for children playing / exploring? / no risk assessment and no indication of how visitors to site would be controlled / Occupants would be vulnerable if a take-off or landing was aborted.
- Waste collection from the site not explained – could attract vermin / accumulation of waste.

Private water supplies

- Existing water supply from bore hole already serves the Lleweni site shared with residential properties – was designed to serve private water needs of Lleweni residents and infrastructure will not support commercial development – alternative provision must be required.
- Site already has a tourist caravan site and proposed development will result in Lleweni Parc taking a disproportionate amount of water.

Re-consultation comments with respect to private water supplies:

- New bore hole is some compromise by the applicant, but installation works would be extensive and impact on amenity of local residents
- New bore hole would draw from same aquifer as existing borehole – concern if there is sufficient water resource to serve existing and proposed boreholes.
- Insufficient information provided regarding siting of proposed new borehole and pipes.

Other Comments:

- Unclear how rubbish / waste would be disposed of.
- Existing caravan site is not well managed (untidy / uncontrolled outdoor furniture / year round occupancy).
- Lodges stated to be built by 'Cambrian Park and Leisure Homes Ltd' – this company went into administration in 2017 and cabins proposed are no longer available.

In support

Representations received from:

James Roland, Midwinter Barn, Oxon

Thomas Sides, 2 The Elms, East Street, Newton Abbot

Andrew Reid 45 Corbetts Way, Thames

Paul Medlock, 37 Graham Way, Taunton

James Lynchehaun, 27A Warren Drive, Wallasey (original and re-consultation responses)

Wendy Ramsay, 42 Ramsey House, Vassall Road, London

Peter Startup, 20 Butts Road, Ottery, Devon

Gillian and Justin Wills, Coppice House, Temple Guiting

Graham Stanford, 3 The Courtyard, Ackleton

Simon Marriott, 1 Croft Cottages, Otley

M. Osborn, Chapel House, Waters Upton, Telford

D. Gill, Rhos Gwyn, Brynteg, Anglesey

Ian Cook, 6, Blossom Close, Andover, Hampshire

G. G. Dale, c/o Lasham Gliding Society, Lasham Airfield, Alton

M. Tapper, 40 Birch Street, Birch

D. Richmond, 3, Holly Close, Ellesmere
Chris Gill, Rhos Gwyn, Brynteg, Anglesey
Paul Smith, Northcote, Kidlington Rd, Islip, Oxon
Roy Garden, 84, Braehead Cres, Stonehaven, Aberdeenshire
K. Ahlner, 5, York Close, Shenfield, Essex
C, Wilson, 2 Grove Bungalow Wormingford Grove, Wormingford
A. Moulang, The Cabin, Prospect Rd., Sandgate, Foldestone
Ian Stewart, 24 Bodtegwel Terrace, St. George Abergele
J. Beard, 33, Bohill, Penryn, Cornwall
Tony Moulang, The Cabin, Folkestone
James Nicholls, Mountain View, Isle of Man
Roy Pentecost, 4 Stratton Villas, Malmesbury
Hugh Jones, The Stones, Stonewalls
Loess Overbury-Tapper, 40 Birch Street, Birch
Jacob Matthews, 6 Jack Stephens Estate, Penzance
Andrew Jones, Cross Fell House, Penrith, Cumbria
Andy Spray, 10 Neville Drive, Thornton
Christine Conlin, 3 Fairbanks Walk, Swynnerton
Francis Bradley, 2 Long Marton Road, Appleby

[REDACTED]
Lorna Sleigh, 34 Wheatfields, Thurston
Mark Crompton, Briery Parrock, Ambleside
Nicholas Jones, Holcombe House, Hemyock, Devon
Patrick Eaton, 1 Briar Gate, Long Eaton, Nottingham
Geoff Wright, 18 Tudor Court, Penrith
Anne Walker, Weathervane Cottage, Troston
Mark Johnson, 172 Greenacres, Wetheral
Barry Meekes, Tegfan, Gwyddelwern
Michael Armstrong, 41 Walton Back Lanre, Walton
Daniel Welch, 26 Esmonde Drive, Ilchester
Danielle Welch, Officer's Mess, RAF Valley
John Castle, 5 Lovelace Crescent, Elmesthorpe
Steve Noujaim, The Vetch Tower, Aycote Farm, Rendcomb
Jonathan May, 2 Hintons Coppice, Knowle, Solihull
Steve Pozerskis, 14 Victoria Road, Alton
Craig Lowrie, Wychacre House, Harborough Hill, West Chilton
Keith Davey, 73 Equilibrium, Lindley, Huddersfield
Sarah Drury, Estancia, Gore Road, Bredgar, Kent
P. Naegeli, Orchard House, Cleves Lane, Upton Grey
Wyn Davies, Quay Gardens Barn, Monmouth Avenue
Julia Anderson, Foxhill, Nant y Glyn Rd, Colwyn Bay

Summary of planning based representations in support:

Need / justification

- Would bring business into the area.
- Would supplement local accommodation offer / accommodation can be difficult to find in local area.
- Visitors would use local shops and restaurants.
- Would provide accommodation to long-distance walkers who visit the area, close to the Clwydian Way.
- Would increase local employment and year-round tourism.
- Would help make Lleweni Parc a sustainable business / additional funding stream for site.
- Enhance offering at Lleweni Parc.
- Would secure existing jobs at Lleweni Parc.
- Good for the Welsh Economy.

Enhance existing gliding club business

- Gliding club is one of best soaring sites in UK. Proposal would provide on-site accommodation for users of the gliding club, would enhance the gliding club offer and would be desirable to potential visitors to the gliding club.
- Glider pilots could bring family with them to the site and stay locally for longer, and visit local area.
- Glider users support the local economy by using local shops, cafes etc.
- Would support the financial viability of gliding club.
- Interest in gliding is growing.
- Gliders would like the opportunity to buy a chalet onsite.
- Gliders are expensive – owners want to stay close.
- Gliders fly early in the evening and late at night – need accommodation close by and difficult to get last minute accommodation.

Visual amenity / landscape character

- Development would not be detrimental to character of local area.
- Site is well hidden and idealic location for proposed development, away from site boundary and neighbouring housing.
- Visually in-keeping / won't be an eye-soar like white static caravans.
- .
- Would be discretely located and would not cause any visual harm.

Residential amenity

- Discretely located so would cause no noise disturbance to anyone else.

Accessibility

- Would improve walking routes through the site

Ecology

- Site has been turned into a haven for wildlife

EXPIRY DATE OF APPLICATION: 31/07/2019

PLANNING ASSESSMENT:

1. THE PROPOSAL:

1.1 Summary of proposals

- 1.1.1 This is a full planning application proposing the siting of 24 holiday lodges and associated works on 1.3 ha of land on the Lleweni Parc Estate, referred to in the application documents as 'The Glyn'.
- 1.1.2 The lodges proposed fall within the legal definition of a caravan and plans submitted with the application show the appearance of timber clad cabins. These are included at the front of the report.
- 1.1.3 The main elements of the proposal are:
 - A mix of 13 two-bedroom and 11 three-bedroom lodges with a wrap-around terrace area provided around each unit.
 - The site would be accessed from the existing access off the A543 Denbigh Road and then along an existing private road through the Lleweni Parc Estate.
 - Formation of a new access road approximately 500m in length from an existing field access point which would run along the edge of the airfield leading to the site.
 - New internal access roads leading to each lodge.
 - A total of 34 parking spaces are proposed within the site to serve the development.
 - Foul water drainage would be via a new BIOROCK package treatment plant to be installed at the site.
 - A bin storage area is proposed within the centre of the site.
 - A link to pedestrian footpaths is proposed to the south-east of the site.

- Four existing trees are proposed to be retained.
- 1.1.4 Along with plans, the following documents have been submitted in support of the application:-
- Design and Access Statement (DAS)
 - Ecological Appraisal
 - Topographical Survey
 - Hydrological Information
 - Great Crested Newt Appraisal
 - Planning Supporting Statement
- 1.1.5 The main points of relevance in the Design and Access Statement and Planning Support Statement are:
- The proposal is put forward as a further diversification at Lleweni Parc, which will form “an essential, integral, ancillary part of the recreational activities already permitted at Lleweni Parc”.
 - The development will have direct association with the adjoining gliding airfield and a main attraction for those staying in the lodges will be the activities at Lleweni Parc.
 - The development is put forward as high quality tourism accommodation, and the application is seeking consent for year round occupancy to ‘reduce seasonality’.
 - The availability of lodges on the application site throughout the year, by both ownership and rental, will add to the already strong attraction for the gliding field, thereby helping to spread their use well beyond the limited summer months and encouraging greater spending in the local economy and out of season.
 - A section on economic context and financial sustainability, makes reference to the contribution the development will make to the local and regional economy and increase local visitor spend. Data from a lodge development at Kinsale Golf Course in Flintshire is also referenced to estimate the potential visitor spend in the local economy as a result of the development which the DAS estimated would be in the region of £197K p.a and the contribution made by existing visitors to Lleweni Parc to the local economy is estimated to be £55K.
 - The supporting information also indicates the proposal would create approximately two jobs.

Plans illustrating the site layout are attached to the front of the report.

1.1 Description of site and surroundings

- 1.1.1 The application site comprises 1.3 hectares of land located on the Lleweni Parc Estate.
- 1.1.2 The site would be accessed along a new track running off the existing private road from the A543 Denbigh Road which serves the residential complex in the old Lleweni Hall outbuildings.
- 1.1.3 There are other existing uses at the Lleweni Parc Estate, including the glider airfield and a 20 pitch touring caravan park. The glider airstrip is to the north of the site.
- 1.1.4 The Lleweni complex is to the south of the site, with the nearest residential property approximately 300m from the site boundary.

- 1.1.5 A watercourse runs through the site which is a tributary of the River Clwyd. The River Clwyd itself is approximately 110m to the east of the site. There are also a number of ponds in the general vicinity of the site.

1.2 Relevant planning constraints/considerations

- 1.2.1 The site is outside of any development boundaries as defined in the Local Development Plan and is partially within a mineral safeguarded area.
- 1.2.2 The land is understood to be Grade 3b Agricultural Land, which is defined as moderate quality agricultural land, but is not considered to be the 'best and most versatile' agricultural land.
- 1.2.3 The site is located within the Vale of Clwyd Landscape of Outstanding Historic Interest.

1.3 Relevant planning history

- 1.3.1 A previous proposal for a lodge development at the application site was refused in 2012 and the subsequent planning appeal was dismissed. The reasons for the refusal are quoted in Section 2.1 of the report which follows.
- 1.3.2 There is an existing touring caravan site at Lleweni Park which was granted planning permission in 1991, and there have been a number of planning applications for caravans, residential and visitor accommodation on parts of the Lleweni Park land over recent years.

1.4 Developments/changes since the original submission

- 1.4.1 The applicant has submitted additional information to confirm the intention to install a new borehole to provide water to the proposed development.
- 1.4.2 A Planning Supporting Statement has been provided to address LDP Policy PSE5, PSE11 and PSE12
- 1.4.3 An additional ecological statement has been submitted to address concerns raised by the Council's Ecologist and Natural Resources Wales with respect to Great Crested Newts.
- 1.4.4 Following receipt of the above additional information, the application was subject to a full re-consultation exercise.

1.5 Other relevant background information

- 1.5.1 The existing touring caravan site at Lleweni Parc has consent for the stationing of up to 20 touring caravans.
- 1.5.2 In addition to the touring caravan site, there is also a Caravan Club Certified camping site at Lleweni Parc. Certified sites do not require planning permission providing that no more than 5 touring caravans and / or 10 tents are accommodated at any one time and stays do not exceed 28 days. Visitors are also required to be members of the Caravan and Motorhome Club and sites need to adhere to other Caravan Club requirements.

2. DETAILS OF PLANNING HISTORY:

- 2.1 01/2011/0621/PF - Siting of 20 holiday lodges with associated access, parking and installation of a sewage treatment plant. Refused at Planning Committee 18th April, 2012 for the following reasons:-

1. *It is the opinion of the Local Planning Authority that the proposed layout of the lodges on the site appears unduly cramped with a number of units sited in close proximity to one another, to the retained trees, and to the southern boundary of the site; and it is considered there is inadequate provision for the parking of vehicles for*

occupiers of the lodges and potential visitors. The proposals are therefore considered to be in conflict with tests of Policies GEN 6 and TRA 9 of the Denbighshire Unitary Development Plan.

2. The Local Planning Authority do not consider there is sufficient information with the application to determine whether the proposals involve development on the best and most versatile agricultural land (of Grades 1, 2, or 3a), and hence whether the lodge development would be in conflict with policies ENV 11 and TSM 9 of the Denbighshire Unitary Development Plan and Welsh Government's key objective to conserve the best and most versatile agricultural land, as set out in Chapter 4 of Planning Policy Wales 2011.

3. It is the opinion of the Local Planning Authority that the location of the proposed development would mean people using the lodges would be highly dependent on the private car for access, and there is an absence of safe pedestrian routes linking the site to the public footpath network or along the A road to Denbigh, all limiting the accessibility of the site, contrary to key tests in Policies STRAT 1, STRAT 13, GEN 6, and TSM 9 of the Denbighshire Unitary Development Plan, and Welsh Government's key policy objective of locating developments so as to minimize the demand for travel, especially by private car, as set out in Planning Policy Wales 2011 Chapter 4 and Chapter 8.

The subsequent Planning Appeal was DISMISSED. The conclusions of the Planning Inspector as set out in the Appeal Decision letter were :

"Although I have found that the proposed development would not significantly deplete the agricultural land resource it would cause harm to the living conditions of future occupiers and be insufficiently accessible to accord with sustainable principles, contrary to the development plan and PPW.

For the reasons given above I conclude that the appeal should be dismissed."

Officers would note the previous application was determined under the former Denbighshire Unitary Development Plan policies and Edition 4 of Planning Policy Wales.

Planning history for wider Lleweni Parc Estate:

Dating back to 1991 there are a number of planning applications relating to the gliding club and other caravan development which are of no direct relevance to the current application.

3. RELEVANT POLICIES AND GUIDANCE:

The main planning policies and guidance are considered to be:

3.1 Denbighshire Local Development Plan (adopted 4th June 2013):

- Policy RD1 – Sustainable development and good standard of design
- Policy BSC3 – Securing infrastructure contributions from Development
- Policy PSE5 – Rural economy
- Policy PSE12 – Chalet, static and touring caravan and camping sites
- Policy PSE14 – Outdoor activity tourism
- Policy VOE1 - Key areas of importance
- Policy VOE5 – Conservation of natural resources
- Policy VOE6 – Water management
- Policy ASA1 – New transport infrastructure
- Policy ASA2 – Provision of sustainable transport facilities
- Policy ASA3 – Parking standards

3.2 Supplementary Planning Guidance:

- Supplementary Planning Guidance Note: Caravans, Chalets & Camping
- Supplementary Planning Guidance Note: Conservation and Enhancement of Biodiversity
- Supplementary Planning Guidance Note: Listed Buildings
- Supplementary Planning Guidance Note: Parking Requirements in New Developments

Supplementary Planning Guidance Note: Planning Obligations
Supplementary Planning Guidance Note: Trees & Landscaping

3.3 Government Policy / Guidance:

Planning Policy Wales (Edition 10) December 2018
Development Control Manual November 2016
Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009)
Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities (2010)
Technical Advice Note (TAN) 12: Design (2016)
Technical Advice Note (TAN) 13: Tourism (1997)
Technical Advice Note (TAN) 15: Development and Flood Risk (2004)
Technical Advice Note (TAN) 18: Transport (2007)
Technical Advice Note (TAN) 23: Economic Development (2014)
Technical Advice Note (TAN) 24: The Historic Environment (2017)

3.4 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 Landscape / 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)
- 4.1.7 Impact on Listed Buildings

4.2 In relation to the main planning considerations:

- 4.2.1 Principle
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.

The Justification to Policy PSE12 states "*In the inland rural areas, caravan development, particularly static caravans, can be obtrusive in the landscape and damaging to the character of the rural area unless strictly controlled.*"

Policy PSE5 supports tourism and commercial development which helps sustain the rural economy where it can be demonstrated all four policy tests are met. The tests are:

- i) The proposal is appropriate in scale and nature to its location; and

- ii) Any suitable existing buildings are converted or re-used in preference to new build; and
- iii) Proposal for new buildings are supported by an appropriate business case which demonstrates that it will support the local economy to help sustain local rural communities;
- iv) Within the AONB/AOB, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas, take full account of and seek to enhance the nature and distinctive qualities of the local landscape. In line with national policy any proposals that are considered to be detrimental to the quality of the AONB and World Heritage Site will be refused.

Policy PSE14 supports development proposals that expand or reinforce the tourism offer of the County in the outdoor activity sector. Policy test iv) states '*chalet development is association with outdoor activity tourism will only be permitted if a significant need is demonstrated and there are no opportunities to use or convert existing buildings for tourism accommodation.*'

The Caravans, Chalets & Camping SPG makes it clear that lodges, chalets, pods and other similar structures which fall within the legal definition of a caravan set out in the Caravan Sites Act 1968 will be treated as a static caravan for the purposes of applying Policy PSE12.

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 accommodated in terms of infrastructure, access and habitat and landscape conservation. It also advises that new buildings 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 proposal is for the change of use of land for the siting of 24 holiday lodges and associated works. Whilst the accommodation is referred to as holiday lodges, the Design and Access Statement (DAS) confirms the lodges meet the legal definition of a static caravan and the plans show a twin unit on wheels, which are proposed to be timber clad effect units with a pitched roof. The DAS states consent is sought for year round rather than seasonal occupation of the proposed lodges to meet the needs of visitors to the Lleweni Parc Estate, but consider a 28 day occupancy limitation could apply.

Representations received from the Community Council, the three neighbouring Community Councils, the Council's Strategic Planning and Housing Officer, the Welsh Historic Garden Trust and members of the public have raised concerns with the principle of the development and the lack of justification for a proposed lodge development in this location.

Representations have been received from members of the public, including a number of gliding enthusiasts and other visitors to Lleweni Parc, who are supportive of the scheme.

Whilst the previous planning application for 20 lodges at the application site was not refused on grounds of principle, it is to be noted that this application was determined against the policies of the former Unitary Development Plan. The LDP is the current adopted development plan and is therefore the primary tool against which planning applications have to be assessed. Notwithstanding the planning history, Officers consider the principle of the development has to be re-considered afresh against the current national and local planning policy framework, which is set out above.

In relation to the submission, there is no detailed business plan provided in support of the development. The demand for additional visitor accommodation in this area of the County is not addressed or quantified in the submission, and therefore the predicted contributions to the local economy are not considered to be sufficiently reasoned.

It is not entirely clear from the information provided whether the lodge development would operate as a holiday park development open to the general public, or if lodges are proposed to provide on-site accommodation for current users of Lleweni Parc only.

It is of interest that when planning permission was sought in 2017 to increase the number of pitches on the existing touring site from 10 to 20, the planning application form stated the purpose of the additional pitches was to provide facilities for "Self contained" touring caravans for use in connection with (on-site) pony trekking, gliding and fishing.

No details have been provided relating to the number of current users of the gliding field, or in relation to total number of existing visitors per annum to Lleweni Parc as a whole, other than to reaffirm the existing number of caravan pitches at the site. It is not clear, therefore whether or not the existing touring caravan sites are at capacity, or if there has been any significant increase in users of the site since permission was granted, in order to explain the need for 24 lodges on site.

The submission also states that the lodges would be available for sale and rent, however no details have been provided with regards to the proportion of lodges that would be sold into private ownership, and Officers would query how the proposed development would make a significant contribution to the local economy should the lodges become privately owned.

No costings for the proposed development is provided, and nor has any financial information been put forward to demonstrate why the proposal is needed to secure the financial sustainability of Lleweni Parc.

Members will be aware that there are further caravan / camping sites within the Denbigh area, including The Tyn Yr Eithin Caravan and Camping site on the outskirts of Denbigh, and Station House Caravan Park in Bodfari, as well as more traditional forms of accommodation such as B&Bs and hotels in the Denbigh area and privately owned holiday lets etc, together with the recently consented holiday lodge expansion at Bryn Morfydd in Llanrhaeadr.

In the absence of a detailed business plan, details of existing and projected visitor numbers to Lleweni Parc, evidence that there is a demand for this form of development in this area of the County and how the proposal would make a tangible contribution to the local economy to help sustain local rural communities, Officers consider that insufficient information has been provided to demonstrate compliance with Policy PSE5.

Officers also consider a compelling case has not been put forward to justify there is an overriding need or demand for on site accommodation in association with existing outdoor activity tourism operating from the Lleweni Parc site, and Policy PSE14 test iv) has also not been met.

The Council's Strategic Planning and Housing Officer has reiterated that new static caravans are not permitted under Policy PSE12. Whilst noting Policy PSE 5 provides general support for employment, commercial and tourism developments in rural areas, and Policy PSE 14 supports proposals that expand the outdoor activity sector in the County, neither policy makes reference to proposals for new caravan sites as this is specifically addressed under Policy PSE 12. Nevertheless, the Strategic Planning and Housing Officer considers that insufficient evidence has been provided to meet the criteria under policies PSE 5 and 14, as set out above.

In conclusion, the proposal is therefore considered to be contrary to Policy PSE 5, PSE 12 and PSE 14 and the advice and guidance contained in the Council's adopted Caravans, Chalets and Camping Supplementary Planning Guidance Note, Planning Policy Wales, Edition 10 (December 2018) Section 3.56.

4.2.2 Landscape/ 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.

PPW Section 6.3.3 states 'All the landscapes of Wales are valued for their intrinsic contribution to a sense of place, and local authorities should protect and enhance their special characteristics, whilst paying due regard to the social, economic, environmental and cultural benefits they provide, and to their role in creating valued places.'

Whilst Policy PSE12 does not support the principle of new static caravan sites, the Policy does include tests to be applied to proposals for remodelling existing static sites and for new touring and camping sites, which Officers consider are material to the consideration of this application.

With respect to remodelling of existing static sites, the policy tests seek to ensure the proposed development preserves or enhances the character and appearance of the area and landscape setting. With respect to new touring sites, the policy tests seek to ensure sites are small in scale and proportionate to the location; would not result in an over concentration of sites in any one locality; the development makes a positive contribution to local biodiversity, the natural and built environment; would not appear obtrusive in the landscape; is high quality in terms of layout, design and landscaping; and has no adverse highway or community impacts.

Policy PSE5 requires developments to be appropriate in scale and nature to its location.

Policy PSE 14 requires that development is appropriate to its setting and within the capacity of the local environment and infrastructure.

Policy VOE 1 seeks to protect Historic Landscapes, Parks and Gardens from development that would adversely affect them.

TAN12: Tourism states that new caravan sites should be effectively screened, and planned so as not to be visually intrusive.

The Caravans, Chalets & Camping SPG also sets out development requirements to be addressed and design guidance for any new or extended caravan, chalet and camping sites in the County. The SPG provides guidance with respect to design of new schemes. In terms of landscape and environment, the SPG advises the scale of a development must respect its surroundings; larger proposals will generally only be permitted within or adjacent to settlements; proposals in rural locations must be sensitively developed; proposals should respect the topography of the site and existing levels should be retained wherever possible. It also advises proposals for new sites should be accompanied by comprehensive landscaping scheme.

Representations have been received from the Community Council, neighbouring Community Councils, the Welsh Historic Gardens Trust and local residents which

raise strong objections to the proposal on landscape and visual impact grounds. The Welsh Historic Parks and Gardens Trust considers the site is an element of the Historic Landscape and a feature of the rural historic park landscape, typical of the Vale of Clwyd.

Concerns have also been raised by a number of consultees relating to the development creep at Lleweni Parc, which includes the Portakabin clubhouse, caravan sites, glider hangar, tarmac airstrip, driving school tracks, and access tracks etc, which objectors do not consider enhance the site, or contribute to the quality of the local landscape.

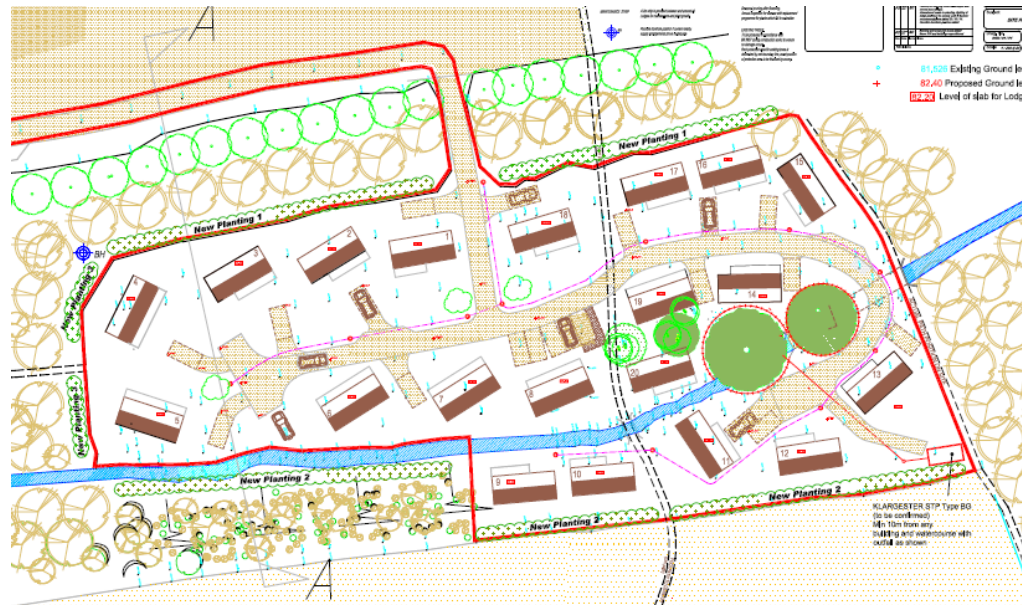
A number of representations in support of the application have also been received from private individuals which consider the proposal to be acceptable in landscape and visual amenity terms.

The previous planning application for 20 lodges at the application site was not refused on landscape and visual amenity grounds, however the previous application was determined under the former UDP policies and there are also differences in the proposals - the site area was smaller, the number of lodges has increased from 20 to 24 with associated development and also since the previous refusal, a number of trees and vegetation has been removed and lodges are now proposed on areas of land along the watercourse that were previously wooded.

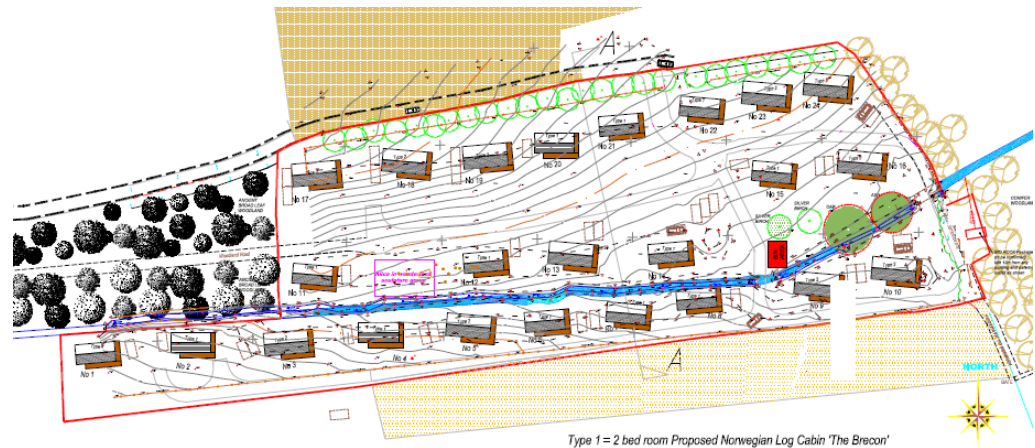
It is therefore considered that the current proposal raises materially different considerations to the previously refused scheme. Accordingly, the proposed impact on landscape character and visual amenity needs to be re-considered against the current planning policy framework, which is set out above.

To assist Members, the proposed site plans for the refused scheme and the currently proposed scheme have been provided below for comparison:

2011 Refused scheme - proposed site layout:



Proposed scheme – proposed site layout:



In relation to the proposal, the lodges would not be located next to any of the existing built development at Lleweni Parc and nor would it be adjacent to the existing touring caravan site. The site would also require a new stretch of private road leading to the proposed lodges, which would impact on the open character of the site. A number of trees and vegetation have also been cleared from the site prior to the submission of the application resulting in the site being more open and exposed.

The proposal for 24 lodges is considered to be large in scale in the context of its locality, and in particular in comparison to the cluster of dwellings at Lleweni, which include a number of Listed Buildings. Also as the lodges do not physically relate to any existing built development at Lleweni Parc, or to the existing touring caravan sites, it would also appear as an isolated development within the former parkland setting.

The lodges proposed would meet the legal definition of a caravan, and appear to be twin units on wheels, and the illustrative photographs (example provided at the front of the report) show the proposed lodges would have timber effect cladding with a pitched roof. The site plans and the illustrative photographs show that large wrap-around raised balconies are also proposed to be installed to each lodge which is also considered to change the character of the lodge and gives the appearance of a more permanent structure.

Parking areas and new access tracks are also proposed within the site, which have been indicated as being formed by rammed stone and tarmac, which would contribute to the overall visual appearance of the scheme.

Whilst the lodges are more spaced out when compared to the previously refused scheme, it is of note that the site area has been increased in size, and an additional 4 units are proposed within the site. Lodges are also now proposed in previously wooded areas along the watercourse, and a number of proposed lodges are little more than 5m apart. The lodges are also broadly aligned in rows, which gives a more sub-urban, linear appearance to the site. There is no integrated landscaping scheme for the site to break up the form of the lodges, and no planting / landscaping is proposed around the periphery of the site to compensate for the trees which have already been removed, or to screen views of the site, in particular from views from the Lleweni complex and public right of way network to the south or from higher ground to the east, including from within the Clwydian Range AONB.

The site is undulating, and the layout does not appear to have been informed by the topographical survey of the site. No sectional plans have been provided, and it is not

clear what groundworks are proposed to facilitate the development, or if land would be built up / cut out to create bases for the caravans.

Whilst conditions could be imposed to require details of groundwork operations, boundary treatments and landscaping, due to the lack of information provided regarding the overall impact on visual amenity and landscaping character, Officers cannot conclude at this stage that harm to landscape character and visual amenity could be successfully mitigated.

In concluding on impacts on visual amenity and landscape character, Officers consider the proposal is for the development of a greenfield site in an open countryside location which is set away from existing built development and similar established land-uses at Lleweni Parc. Trees have already been cleared from the site which has resulted in the area being more open and exposed. No Landscape and Visual Impact Assessment has been submitted with the application and no landscaping scheme is proposed. Due to the density, layout and design of the scheme, the proposal is not considered to be appropriate in scale and nature to its location and nor does it enhance the natural and distinctive qualities of the Vale of Clwyd Historic Landscape, and insufficient information has been provided to demonstrate the harm to landscape character and visual amenity can be successfully mitigated.

The proposal is therefore considered to be contrary to Policies PSE5, PSE12, PSE14 and VOE1 the advice and guidance contained in Planning Policy Wales Edition 10 (December 2018) Section 6.3.3 and the Council's adopted Caravans, Chalets & Camping Supplementary Planning Guidance Note.

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.

Representations have been made in objection to the scheme from the Community Council, neighbouring Community Councils and local residents raising concerns in respect of residential amenity issues. The issues raised relate to the size and scale of the development, and in combination with existing touring caravan site, would result in an unacceptable impact on residential amenity from noise, disturbance, light pollution, traffic etc.

In terms of the previously refused scheme, it was partly refused due to the scheme failing to provide adequate amenity standards for future occupiers of the proposed lodges. This reason related specifically to criteria in policies in the former UDP, and there is no equivalent requirement in current national or local planning policies.

The proposal is for a development of 24 lodges comprising of 13 two-bedroom and 11 three-bedroom units. Assuming a maximum occupancy of four persons per two-bedroom unit and six persons per three-bedroom unit, this would equate to 118 persons at maximum capacity. Whilst this number of visitors at any one time could potentially generate a level of noise that may be audible from residential units at Lleweni, the site is some 300m to the north of the nearest residential property, and therefore having regard to the separation distances, Officers would consider it difficult to argue the level of noise and disturbance would be of such a level that would be deemed unacceptable in planning terms.

No details have been provided regarding how the site would operate and be managed, however Officers consider such details could be dealt with by condition

requiring a management plan to be submitted for approval, and to ensure the site operates in accordance with the management plan.

Details of external lighting have also not been provided but again it is considered that this could be adequately dealt with by a condition.

Notwithstanding the concerns raised by local residents, having regard to the separation distance between the site and the nearest residential properties, and the potential to apply controls by condition, it would be difficult to conclude the proposed development would give rise to a level of noise and disturbance that would justify a refusal of planning permission on residential amenity grounds.

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 (PPW 10) (Section 5.2), TAN 5 and the Conservation and Enhancement of Biodiversity SPG (2016), 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.

Representations have been received from Community Councils, local residents and Welsh Historic Gardens Trust raising concerns over the adverse impact of the proposed development on local biodiversity.

A number of representations have also been received from members of the public who consider the proposal would enhance biodiversity of the site.

The application is supported by an Ecological Assessment, and further information was requested with respect to Great Crested Newts following initial consultation responses from Natural Resources Wales (NRW) and the Council's Ecology Officer.

Following submission of additional information to address concerns relating to Great Crested Newts, NRW have confirmed they are satisfied the works are not likely to be detrimental to the maintenance of the favourable conservation status of a local population of GCN.

NRW have also advised that should planning permission be granted, conditions are required to be imposed to secure details of an external light spillage scheme, otter reasonable avoidance measures scheme and a biosecurity risk assessment prior to commencement.

Having regard the location, nature and scale of the development, the findings of the Ecological Assessments and views of statutory consultees, subject to the necessary planning conditions being applied to ensure the proposal does not result in detriment the favourable conservation status of protected species, including bat and otter, and to ensure the proposal does not result in the spread of non-native invasive species, Officers are satisfied the proposal would not have an unacceptable impact on ecological interests.

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.

Planning Policy Wales (PPW 10) Section 6.6.9 states 'The adequacy of water supply and the sewage infrastructure should be fully considered when proposing development, both as a water service and because of the consequential environmental and amenity impacts associated with a lack of capacity'.

Planning Policy Wales (PPW 10) Section 6.6.22 to 6.6.29 identifies flood risk as a material consideration in planning and along with TAN 15 – Development and Flood Risk.

Policy VOE6 states all developments will be required to eliminate or reduce surface water runoff for the site, where practicable.

Representations have been received from local residents raising concerns regarding proposed means of providing water to the development, the flood risk and the foul and surface water drainage.

Each consideration is set out separately below:

Private Water supply

Drinking water at Lleweni Parc and the dwellings at the Lleweni hamlet is currently provided by an existing borehole.

Local residents have raised significant concerns regarding the capacity of the existing boreholes to serve the proposed development, without detriment to existing supply.

The Council's Public Protection Officer requested a hydrological assessment be submitted to demonstrate the existing borehole was capable of providing a sufficient supply to the site without detriment to the existing users.

The applicant has instead proposed a new dedicated borehole to serve the proposed development, and a letter from Hydrological Consultants has been submitted to confirming that a new borehole could be installed at a sufficient distance from current or proposed contamination sources, and there is sufficient volume of water which could be abstracted without detriment to the local aquifer or existing boreholes.

The Council's Public Protection Officer has confirmed the addition of a new borehole to serve the proposed development will assist in safeguarding the sufficiency of the existing supply to the site and nearby residential properties, and that the information provided by the borehole engineers suggests a sufficient supply can be obtained from the new borehole for the proposed development without impacting on existing nearby abstractions. A planning condition is advised to ensure the location of the new bore hole is acceptable and to ensure it is not within 50m of any existing or proposed foul drainage system.

In respecting the concerns of local residents, Officers are therefore satisfied that the proposal to provide a new borehole to serve the site would adequately protect private water supply serving existing dwellings. Conditions can be imposed for the avoidance of doubt to ensure the exact location and specification of the borehole is approved prior to the first occupation of the development.

Foul water drainage

Foul water drainage is proposed to be dealt with by a BIOROCK private treatment plant.

In noting concerns raised regarding the lack of detail submitted regarding the means of foul water disposal, private sewage treatment plants must be installed and

maintained in accordance with Building Regulations, and need to be registered with Natural Resources Wales.

An Environmental Permit or Exemption is also required from NRW to discharge anything apart from uncontaminated surface water to a watercourse / ditch.

Conditions could also be imposed requiring full details of the installation of foul water drainage.

Officers therefore consider, subject to detailing being secured by condition, the principle of the foul water drainage is acceptable in policy terms.

Surface water drainage:

The application form confirms surface water drainage is proposed to discharge to the watercourse, however no details have been provided.

The Council's Drainage Engineer has confirmed no concern in principle with the surface water drainage arrangements, however detailing would need to be secured by condition for approval prior to commencement.

Ordinary watercourse consent would also be required to discharge into the watercourse and flows would be required to be attenuated as part of this.

Officers therefore consider, subject to detailing being secured by condition, the principle of the surface water drainage proposed is acceptable in policy terms.

Flood risk:

The application site is located entirely within Zone A flood risk area as defined by the Development Advice Map (DAM) in TAN15. The site does however adjoin a Zone C2 flood risk area of the River Clwyd and there is a watercourse which runs through the site which is a tributary of the River Clwyd.

A Zone A flood risk area is considered to be an area at little or no risk of fluvial or tidal / coastal flooding.

Both NRW and the Council's Flood Risk Manager have been consulted on the application, and neither have raised an objection to the proposal on flood risk grounds, and therefore it is not considered that the proposal would result in an unacceptable impact on flood risk.

4.2.6 Highways (including access and parking)

Policy RD1 reflects the general principles of the LDP to ensure new development is sustainably located, provides safe and convenient access to a range of users, and does not have an unacceptable impact on highway safety.

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.

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.

PPW Section 3.12 states *“Good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys. Achieving these objectives requires the selection of sites which can be made easily accessible by sustainable modes as well as incorporating appropriate, safe and sustainable links (including active travel networks) within and between developments using legal agreements where appropriate.”*

PPW Section 3.35 states *“In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys.”*

PPW 4.1.33 states *“In determining planning applications, planning authorities must ensure development proposals, through their design and supporting infrastructure, prioritise provision for access and movement by walking and cycling and, in doing so, maximise their contribution to the objectives of the Active Travel Act.”*

Representations have been received from Community Councils and local residents raising concerns regarding highway safety in relation to the access with the highway, the positioning of the proposed site access off the private lane, the condition and increased usage of the private lane and the accessibility of the site, in terms of access to public transport and pedestrian routes into Denbigh.

Each consideration is set out separately below:

Highway safety

In terms of the existing junction of the land serving the Lleweni complex onto the A543, Highways Officers consider this adequate and of suitable design and visibility to accommodate further vehicle movements from the site.

Although the site in terms of sustainability is questionable, Highways Officers consider that there would be no highway safety related issues arising from the proposals and therefore have no objection.

Private access road

The site would be accessed from the existing private road which runs through the Lleweni Parc Estate, and then via a proposed new section of road across fields to the south of the airstrip.

There are 19 individual residential properties located in the Lleweni complex which utilise the private road to access their properties, as well as existing visitors to Lleweni Parc.

Concerns from local residents has been raised regarding the impact of the proposal on the condition of the private road due to increased road usage, and on the safety of other road users due to the increased usage of the private road and due to the location of the proposed access to the development, which is in a bend in the private road.

The condition and upkeep of the private road is not a planning matter, but rather a civil matter between relevant parties.

The development is proposed to be accessed via an existing gated access off a bend in the private lane, and then along a new section of private road leading to the proposed site.

Whilst the proposal would increase the volume of traffic utilising the private road, the overall numbers would still be relatively low, and due to the nature of the development, it is likely traffic movements to and from the proposed lodge development would be spread throughout the day. There are existing passing places along the private lane which could be utilised, and conditions could be imposed to require additional passing places should it be deemed necessary.

Whilst visibility splays have not been indicated for the proposed access, as the proposed access point is located on the outside of the bend in the road, adequate visibility splays could be achieved, and full details could be secured by a planning condition. Conditions could also be imposed requiring the access gates to be set back, to allow cars to be clear of the existing private road should traffic need to be halted whilst the air strip is in use.

It is therefore not considered that the proposal would result in an unacceptable volume of traffic being generated along the private lane, and conditions could be imposed requiring additional passing places to be provided along the section of the existing road leading to the site, and in relation to the detailing of the access point off the highway.

Parking

The proposal is for a mix of 13 two-bedroom and 11 three-bedroom lodges, the submitted plans show that a terrace area would be provided around each unit.

The Parking in New Developments SPG does not specifically include lodge developments, however for hotels, the requirement would be 1 space per bedroom.

A total of 34 parking spaces are proposed to serve the site.

Highways Officers have raised no objection to the proposal on parking grounds, and having regard to the nature and location of the development, Officers are satisfied sufficient on-site parking has been provided.

Accessibility

One of the grounds for refusing the previous application was that the location of the proposed development would mean people using the lodges would be highly dependent on the private car for access, and there is an absence of safe pedestrian routes linking the site to the public footpath network or along the A road to Denbigh, all limiting the accessibility of the site. The proposal was considered to be contrary to the policy tests contained in the former UDP and to the key National policy objective of locating developments so as to minimise the demand for travel, especially by private car.

Whilst the previous application was refused against policies contained in the former UDP and Edition 4 of PPW, Officers nevertheless consider weight should be apportioned to the planning history with respect to accessibility, given that the nature and location of the proposal is very similar to the refused scheme.

Highways Officers confirm there is a bus route along the A543 which stops at the junction of Lleweni Parc every two hours throughout the day, but this is a limited service. The junction with the A543 is approximately 1km from the proposed site.

Highways Officers have noted that in terms of offering alternative modes of transport from the site, this is not ideal for walking and cycling along the A543 to Denbigh as there is no footway or designated cycle paths along the A453.

Due to the speed of the road, Officers consider it would likely to be unsafe for pedestrians to walk along the roadside verge into Denbigh, especially at night as the road is largely un-lit.

The alternative pedestrian route into Denbigh would be through the Lleweni Parc Estate linking to the public right of way which runs in a north-south direction and joins Whitchurch Road to the south (close to Kilford Farm), and then along Whitchurch Road into the centre of Denbigh. The plans show a link from the site to this network of public footpaths from the south-eastern corner of the site.

However, this route from the site into Denbigh town centre is over 5km / 3miles in length, and there are no public footpaths along Whitchurch Road between Kilford Farm and the Brookhouse area on the approach into Denbigh, and pedestrians would therefore also be required to walk along the roadside verge along this route. Sustrans have also confirmed this right of way is not currently suitable for cyclists.

Having regard to the above, as was the case when the previous application was considered, it is highly likely that the proposed development would still be highly dependent on the private car for access.

In concluding on the issue of accessibility, the site is not located in a settlement which has relatively good accessibility by non-car modes and nor could it be considered to offer good active travel connections to Denbigh or other settlement centres in the locality, and nor would the development prioritise provision for access and movement by walking and cycling.

The development would therefore constitute a car-based development which is not easily accessible by sustainable modes of travel, and the site is considered to be located in an unsustainable location, contrary to Planning Policy Wales Edition 10 Sections 3.12, 3.35 and 4.1.33.

4.2.7 Impact on Listed Building

Local Development Plan Policy VOE1 seeks to protect sites of built heritage from development which would adversely affect them, and requires that development proposals should maintain and wherever possible enhance them for their characteristics, local distinctiveness and value to local communities.

Planning Policy Wales (PPW 10) Section 6 'Distinctive and Natural Places' refers specifically to the need to ensure the character of historic buildings is safeguarded from alterations, extensions, or demolition that would compromise their special architectural and historic interest.; and 6.1.10 indicates that where a development proposal affects a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building or its setting, and any features of special architectural or historic interest which it possesses.

Representations have been received from the Community Council, neighbouring Community Councils and local residents raising concerns that the proposed development would be detrimental to the setting of listed buildings.

There are a number of Grade II* and Grade II Listed Buildings to the south of the site including Lleweni Hall and associated former outbuildings, which have now been converted to residential dwellings, with the closest being some 300m to the south of the proposed site.

TAN24 defines setting as '*The setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not itself a historic asset, though land within a setting may contain other historic assets.*'

Whilst the Lleweni Parc Estate was historically parkland associated with Lleweni Hall, existing operations at Lleweni Parc have already affected the original character and setting of the historic parkland and the setting of the various Listed Buildings at Lleweni.

Having regard to the separation distance, the intervening topography and the existing operational development and land uses at Lleweni Parc, Officers do not consider the proposals would have a detrimental impact on the setting of Listed Buildings which would warrant a refusal of planning permission on built heritage grounds.

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 a development of 24 lodges on a greenfield site located on the Lleweni Parc Estate.
- 5.2 A significant number of representations have been received in response to the proposal, with objections being received from the Community Council, neighbouring Community Councils, local residents, The Welsh Historic Gardens Trust and the Council's Strategic Planning and Housing Officer. A number of representations have been received from members of the public in support of the application, predominately from existing visitors to Lleweni Parc.
- 5.3 A similar scheme was refused at the site in 2011 on three grounds, which was upheld at Appeal. Whilst the planning history is of relevance and should be afforded some weight, it has to be recognised that the current scheme raises materially different considerations with respect to the principle of the development and the impact on landscape character and visual amenity due to changes to national and local planning policy, and due to the extension of the site area, recent tree clearance and the increase in the number of unit from 20 to 24.
- 5.4 In concluding on the principle of the proposal, Officers consider that as the lodges would meet the legal definition of a static caravan, the proposal would be in direct conflict with Policy PSE12 in the LDP. Due to the absence of a detailed business plan, details of visitor numbers and users of Lleweni Parc and clear evidence to demonstrate how the proposal would make a tangible contribution to the local economy to help sustain local rural communities, Officers consider that insufficient information has been provided to demonstrate compliance with Policy PSE5. Officers also consider a compelling case has not been put forward to justify there is an overriding need or demand for on site accommodation in association with existing outdoor activity tourism operating from the Lleweni Parc site, and Policy PSE14 test iv) has also not been met. The principle of the proposal is therefore not considered to be acceptable.

5.5 In concluding on impacts on visual amenity and landscape character, Officers consider the proposal is for the development of a greenfield site in an open countryside location which is set away from existing built development and similar established land-uses at Lleweni Parc. Trees have already been cleared from the site which has resulted in the development site being more open and exposed. A Landscape and Visual Impact Assessment has not been submitted with the application and no landscaping scheme is proposed. Due to the density, layout and design of the scheme, the proposal is not considered to be appropriate in scale and nature to its location and nor does it enhance the nature and distinctive qualities of the Vale of Clwyd Historic Landscape, and insufficient information has been provided to demonstrate the harm to landscape character and visual amenity can be successfully mitigated.

5.6 The proposal is therefore not considered to be acceptable on a number of grounds and is recommended for refusal.

RECOMMENDATION: REFUSE- for the following reasons:-

The reasons for the conditions are:-

1. It is the opinion of the Local Planning Authority that the units of accommodation proposed meet the legal definition of a static caravan, and that a compelling case has not been made to justify a departure from Local Development Plan Policy PSE12 which does not permit new static caravan sites. Insufficient information has been provided to demonstrate how the proposal would support the local economy to help sustain local rural communities, or to demonstrate that there is a significant need for this form of tourism accommodation to support the outdoor activity tourism operating from Lleweni Parc. The proposal is therefore considered to be contrary to Denbighshire Local Development Plan Policies PSE5, PSE12 and PSE14 and the advice and guidance contained in the Council's adopted Caravans, Chalets and Camping Supplementary Planning Guidance Note.
2. It is the opinion of the Local Planning Authority that the proposal involves the development of a greenfield site in an open countryside location set away from existing built development and similar established land-uses at Lleweni Parc, which is located within the Vale of Clwyd Historic Landscape. Due to the density, layout and design of the scheme, the proposal is not considered to be appropriate in scale and nature to its location and nor does it enhance the natural and distinctive qualities of the local landscape, and insufficient information has been provided to demonstrate how the impact on landscape character and visual amenity can be successfully mitigated. The proposal is therefore considered to be contrary to Denbighshire Local Development Plan Policies PSE5, PSE12, PSE14 and VOE 1 and the advice and guidance contained in the Council's adopted Caravans, Chalets & Camping Supplementary Planning Guidance Note and Planning Policy Wales Edition 10 (December 2018) Section 6.3.3.
3. It is the opinion of the Local Planning Authority that the site is in a location which has relatively poor accessibility by non-car modes, and does not offer good active travel connections to Denbigh or other settlement centres in the locality, including movement by walking and cycling. It is considered that the development would therefore be heavily reliant on the motor car and is in an unsustainable location, contrary to guidance contained in Planning Policy Wales Edition 10 (December 2018) Sections 3.12, 3.35, and 4.1.33.