
LAND TO THE NORTH OF HANMER ARMS, HAMNER SY13 3DE

Proposed touring caravan park (10 pitches), amenity building and ancillary works

Planning Statement

Town and Country Planning Act 1990

Prepared by:

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Client:

Carlton Property Holdings Ltd

Date:

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RLPP

Richard Lee Project Planning



1. INTRODUCTION

1.1 RLPP has been instructed to submit this outline planning application for a proposed touring caravan park (10 pitches), the erection of an amenity building and ancillary works on land adjacent to the Hanmer Arms. It is an application for a different type of tourist accommodation facility of a smaller scale, following the refusal of outline planning permission for holiday lodges on 31st October 2019 (ref: P/2019/0711).

1.2 The previous application was refused on the following grounds:

1. The proposal, by virtue of its proximity away from the existing serviced accommodation of the Harmer Arms, as well as its self-servicing nature, is not considered to comprise an extension to the existing serviced accommodation, but would form new visitor accommodation outside a settlement limit, to which UDP Policy CLF9 presumes against. The principle of development is considered to be unacceptable.
2. The proposal would introduce a significant amount of built form to the site, altering the character of the site and locality, which would be exacerbated by virtue of the sites prominence in the landscape. The proposal as a result is considered would harm existing visual amenities of the area. The proposal would conflict with UDP Policy GDP1 and CLF9.

1.3 The purpose of this statement is to compliment the "Design and Access Statement" and the other reports which have been prepared as separate documents. It addresses the revised proposal in terms of the relevant legislation, national policy and the development plan and assesses its merits in this context.

1.4 In addition to this planning statement, the following documents have been prepared and are submitted in support of this planning application:

Site Layout Plan	Enzygo
Design and Access Statement	RLPP
Heritage Impact Assessment & Statement of Significance	Enzygo
Landscape and Visual Impact Assessment	Enzygo
Drainage Strategy	Enzygo
Ecological Desk Study Addendum	Enzygo
Stage 1 Habitat Regs Assessment Screening Report*	Enzygo
GCN Ecological Impact Assessment	Bobby John Smith
Protected Species Survey	Elizabeth Barrett
Arboricultural Impact Assessment	Urban Forestry Group
Arboricultural Method Statement	Urban Forestry Group

- 1.5 It is noted that the accompanying technical reports relate to the previous, larger-scale, lodge scheme. In view of the reduced scale and nature of the current touring park proposal, it is contended that these reports provide a robust assessment of impacts of the site's development in principle and therefore remain valid.

2. DEVELOPMENT PLAN

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan for the area unless material considerations indicate otherwise.
- 2.2 The Development Plan for this area presently comprises the Wrexham Unitary Development Plan. Whilst Wrexham UDP remains the adopted development plan for the area, it was adopted in February 2005 and covers the period 1996 – 2011. It is therefore largely out of date. However, certain policies remain relevant to the site and the development proposal.
- 2.3 The examination into the Wrexham Local Development Plan 2 (LDP2) 2013 to 2028 commenced on 3rd September 2019. Given the stage that this draft plan has reached, limited weight can be attributed to the policies that it is proposing.
- 2.4 National planning policy in the form of the Planning Policy Wales Edition 10 was published in December 2018 and is supported by a series of updated Technical Advice Notes (TANS). This represents up to date planning policy and is a material consideration in determining this planning application.

3. PLANNING POLICIES

- 3.1 The following planning policies are relevant to this planning application:

Wrexham UDP:

Policy GDP1	Development Objectives
Policy GDP2	Capacity of Infrastructure and Community Facilities
Policy EC4	Hedgerows, Trees and Woodland
Policy EC5	Special Landscape Areas
Policy EC6	Biodiversity Conservation
Policy EC7	Conservation Areas
Policy EC9	Listed Buildings of Special Architectural or Historic Interest
Policy EC11	Archaeology
Policy EC12	Development and Flood Risk

Policy EC13 Surface Water Run-off
Policy CLF10 Touring Caravan and Camping Sites

Emerging LDP2 Policies:

Policy SP2 Location of Development
Policy SP9 Economic Growth Employment and Enterprise
Policy SP15 Natural Environment
Policy SP16 Historic and Cultural Environment
Policy SP20 Green Infrastructure
Policy DM1 Development Management Considerations
Policy NE1 International & Nationally Designated Nature Conservation Sites
Policy NE2 Locally Designated Sites of Nature Conservation Importance
Policy NE3 Trees, Woodlands and Hedgerows
Policy NE5 Special Landscape Areas
Policy EM5 Visitor Accommodation Outside Settlement Limits

Planning Policy Wales

3.2 PPW Para 2.2 advises:

“Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.”

3.3 The implications of the above policies are addressed in the Assessment Section below.

4. ASSESSMENT

4.1 This application seeks outline planning permission for a proposed touring caravan park (10 pitches), the erection of an amenity building and ancillary works. It is a new proposal following refusal of planning permission for holiday lodges on a larger site on the grounds stated in para 1.2 of this statement. The current application proposal seeks to diversify and extend the range of visitor accommodation available at Hamner Arms.

Principle of the Proposal

4.2 The application site is not allocated for a specific use or development and is located beyond the Settlement Limit of Hanmer. The Development Plan policy relevant to the principle of the application proposal is now UDP Policy CLF10: “Touring Caravan and Camping Sites”, which advises that new touring caravan and camping sites will only be permitted where (*italics*):

- a) *the site is unobtrusive and well screened without the need for additional strategic landscaping* – This point is addressed within the accompanying LVIA, Heritage Impact Assessment and DAS. With the exception of the amenity building, the area will remain open and largely undeveloped.
- b) *the site is not located within a green barrier or Special Landscape Area* – It isn't.
- c) *the site is used for touring purposes only and is not used for the storage of caravans which are not in use* – This can be conditioned.

4.3 Emerging LDP2 Policy EM5: "Visitor Accommodation Outside Settlement Limits", also permits new touring caravan and camping sites and extensions to existing sites provided that:

- i. *The scale, form and location of the development does not have a harmful effect on the character of the countryside* – Again, this is addressed within the accompanying LVIA, Heritage Impact Assessment and DAS. With the exception of the amenity building, the area will remain open and largely undeveloped.
- ii. *The site is used for touring purposes only and not for the storage of caravans which are not in use* – Again, this can be conditioned.

4.4 Emerging LDP2 Policy SP9 promotes the diversification of the local economy and the widening of the economic base by a range of measures, including:

"Maintaining and enhancing the County Borough's tourism, culture and leisure offer taking into account the unique character, local distinctiveness and heritage of the area and its context in the wider sub region."

4.5 PPW guidance provided at para 11.1.7 also recognises that:

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

4.6 PPW para 11.2.7 advises:

"The development plan should encourage the diversification of farm enterprises and other parts of the rural economy for appropriate tourism, sport, recreation and leisure uses, subject to adequate safeguards for the character and appearance of the countryside, particularly its landscape, biodiversity and local amenity value." [RLPP emphasis]

4.7 The proposed development also accords to many of the core objectives and targets set out in Welsh Government's Strategy for Tourism 2013–2020. The Strategy

advises that the focus for investment in tourism will be on product quality and range. It states:

“Providing an excellent experience at every level of business activity is vital for Wales to improve its competitive position. Value for money is as important as ever, but there is no reason why Wales cannot aspire to provide best in class provision across the spectrum. There is clear evidence to show that investment in better quality visitor facilities, particularly accommodation, supports higher performance and drives profitability. While the quality of the tourism product in Wales has never been higher, there are still important gaps that need to be filled if the vision of delivering excellence is to be achieved.

..... Opportunities exist to promote higher quality and facility provision in our caravan and self catering sectors and to accelerate the encouraging investment that has taken place in recent years. [RLPP emphasis]

- 4.8 Hanmer Arms has been under new management for the last 2 1/2 years and is now a thriving local pub. Prior to that, the pub has had a chequered history with 3 closures in 10 years. However, its very success and survival requires continuing support from additional visitors to support the pub and restaurant. With new events run by Hanmer Arms, a greater range of accommodation is needed or there will be a gradual decline in this community facility.
- 4.9 Touring caravan sites and camping proposals are generally supported provided they are acceptably located and screened and provide adequate access and servicing. The application site lies close to the A539, providing excellent accessibility for touring caravans. It utilises the same private access road as Hanmer Arms. The site’s location offers an easily accessible base to explore the wider area.
- 4.10 Developments of this nature are likely to assist in establishing the area as a visitor destination, with a range of high-quality accommodation and attractions. This small-scale touring park proposal therefore accords to up to date national planning policy. It will help to improve the quality and range of the local accommodation product and attract an increased number of overnight visitors, creating jobs both on-site and indirectly in the wider local economy through increased visitor expenditure. This will help to support local shops and services, as well as creating further employment opportunities for local people, therefore representing an important net gain to the local economy.

Summary

- 4.11 The proposed development of a small-scale touring caravan park to the north of Hanmer Arms will create a high-quality new addition to the area’s accommodation stock. It accords to the principal UDP Policy CLF10, emerging LPD2 Policy EM5,

National Policy and is supported by the Government's Tourism Strategy. There is no policy presumption against the application proposal. It is therefore contended that the application proposal is acceptable in principle.

Addressing the Impacts of the Proposals

4.12 UDP Policy PS2 advises that development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment. This policy is expanded upon in Policy GDP1 which sets out a list of criteria to be addressed:

- a) Character and appearance – These points have been addressed in the accompanying LVIA, Heritage Impact Assessment and DAS. They are further addressed in paras 4.13 – 4.15 in this Statement.
- b) Personal and community safety and security - This has been addressed in the accompanying DAS.
- c) Design to conserve energy and water resources - This has been addressed in the accompanying DAS and can be further addressed by planning condition.
- d) Safe and convenient pedestrian and vehicular access - This has been addressed in the accompanying DAS.
- e) Access to public transport facilities, pedestrian and cycle routes - This has been addressed in the accompanying DAS.
- f) Safety and amenity - This has been addressed in the accompanying DAS.
- g) Service provision – This matter can be addressed by planning condition.
- h) Nature conservation and wildlife interest – Wildlife surveys have been carried and the reports are submitted in support of this application in accordance with the requirements of UDP Policy EC6.
- i) Flooding, soil erosion, landslides or contamination – A drainage assessment and strategy is submitted in support of this application. This matter can be further addressed by planning condition.
- j) Welsh cultural and/or linguistic identity – This will not be detrimentally affected. The proposal will provide economic support to the local community.
- k) Sustainable communities – This has already been addressed in this Assessment. However, given the greater emphasis on sustainability in PPW, this is further addressed later in this Statement.

4.13 National and local level planning policy encourages sustainable development in suitable locations that do not have significant effects upon the landscape. The proposed development supports this in that it will be located on a site where landscape and visual effects will be minimised. Policy NE5 seeks to protect, manage and enhance the character and quality of Special Landscape Areas including the "Bettisfield, Gredington, and Hanmer" SLA. It restricts development to proposals

which include measures to protect and enhance the character and quality of the particular landscape features for which the SLA has been designated. However, it is noted that the application site continues to be excluded from the Special Landscape Area designation. It is also located outside Hanmer Conservation Area.

- 4.14 The accompanying LVIA identifies the existing landscape character and visual amenity resource, including Hanmer Conservation Area and nearby listed buildings, and considers the likely effects of the proposals on this baseline situation. It goes on to systematically consider the residual effects of the application proposals on the landscape character and the visual amenity of the area. Both the LVIA and Heritage Impact Assessment conclude that the site has the capacity to accommodate a larger-scale development than what is now being proposed and that any resultant effects on landscape and views would be slight and hardly perceptible from the surrounding area. Furthermore, there is significant scope to include landscaping in the form of new hedgerows and tree planting on the site as part of the development which will provide additional screening and will establish a new field boundary hedge to enclose the eastern boundary.
- 4.15 It is therefore contended that it has been demonstrated that the application proposals do not conflict with UDP Policies EC5, EC7 and EC9, emerging LDP2 Policy SP16 and the CADW Guidance.
- 4.16 UDP Policy EC6 advises that development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.
- 4.17 Emerging LDP2 Policy NE1 advises that development likely to significantly affect any site of international importance will be subject to a Habitat Regulations Assessment (HRA). Development will only be permitted where it is possible to ascertain that there will not be an adverse effect on the integrity of the site. Development likely to impact the special features of a nationally designated site will only be granted in exceptional circumstances where appropriate compensation can be provided.
- 4.18 Hanmer Mere is a designated SSSI which is located approx 220 metres to the south of the application site. It forms part of the Midland Meres & Mosses - Phase 2 Ramsar site. This planning application is therefore supported by the following assessments:

- Ecological Desk Study Addendum
- Stage 1 Habitat Regs Assessment Screening Report
- Drainage Assessment and Strategy

4.19 These assessments have considered the potential impact of the application proposals upon Hanmer Mere and other local natural habitats. They conclude that there is no anticipated likely significant effect of the proposals on the Midland Meres & Mosses Phase 2 Ramsar (or the overlapping Hanmer Mere SSSI). The application proposals also provide opportunities for 'biodiversity net gain' in accordance with PPW and local planning policy.

4.20 It is therefore contended that it has been demonstrated that the application proposals do not conflict with UDP Policy EC6.

Summary

4.21 The accompanying technical reports demonstrate that the application proposals will not have an adverse impact upon the local landscape character, Hanmer Conservation Area, wildlife habitats nor other features of acknowledged importance. It has therefore been comprehensively demonstrated that the application proposals accord to the relevant parts of UDP Policy GDP1 and other relevant policies.

Other Material Considerations

National Planning Policy – Sustainable Development

4.22 At the heart of PPW is the presumption in favour of sustainable development. With regard to the three dimensions of sustainable development, the following aspects are directly relevant:

Economic Role

4.23 With regard to rural business diversification, PPW para 5.6.8 advises that Planning authorities should adopt a positive approach to diversification projects in rural areas. Diversification can strengthen the rural economy and bring additional employment and prosperity to communities.

4.24 Whilst this proposal is relatively small scale, it will contribute to the continuing viability of Hanmer Arms by providing a wider choice of accommodation options to suit different needs than those already catered for. It will generate new employment at the site and support the existing businesses and their employees by extending the period of the year and the number visitors stay there. It will also support the area's tourism economy and will have positive effects upon the local economy through the supply of goods and services to visitors and deliver additional potential spending within local shops, food and drink outlets.

4.25 PPW para. 5.5.3 advises that in rural areas, tourism-related development is an

essential element in providing for a healthy and diverse economy. Development should be sympathetic in nature and scale to the local environment. This has already been demonstrated earlier in this Assessment.

Social Role

4.26 Hanmer Arms is accessible to the local community and also the facilities and events held there. The proposal would add to the sustainability of Hanmer Arms which is an important community facility for local people. It will also support the local rural community by supporting existing local facilities and employment.

Environmental Role

4.27 PPW para 5.6.11 advises that diversification activities should be supported where there is no detrimental impact on the environment and local amenity.

4.28 The application proposals represent an effective, low-key and sensitive use of the land in its context. It also provides an opportunity to enhance both the natural environment and visual amenity. It has been demonstrated through the LVIA and the HIA that its impact upon the landscape and heritage assets would be negligible. Whilst the site is located outside the Settlement Line, it is not covered by any specific policy that indicates that development should be specifically restricted. Indeed, PPW para 3.56 is supportive of proposals to provide tourist accommodation adjacent to settlements in order to enhance provision for tourism.

4.29 There is a range of local features and facilities in Hamner and the surrounding area that attract visitors. The site is accessible to the Wrexham-Whitchurch bus service. The site is therefore accessible by other transport modes than the private car and has access to local attractions, cycle routes and the PROW network.

4.30 It is therefore contended that the application proposal represents sustainable development that accords to the Local Plan and PPW. Sustainable development proposals that accord to the development plan should be supported.

5. CONCLUSION

5.1 PPW is very supportive of tourism related development. With regard to development management, PPW para 11.3.1 advises (in part):

“In determining planning applications for tourism developments, local planning authorities need to consider the impact of proposals on the environment and local community.....”

5.2 From a strategic perspective, it is clear that the small-scale, touring park development now proposed accords to many of the objectives set out in PPW and

the Welsh Government Strategy for Tourism. It will deliver new visitor accommodation that has been sensitively designed to respond to its rural context. It will assist in improving the range of the local accommodation product available and attract a greater number of overnight visitors - creating jobs both on-site and indirectly in the wider local economy.

5.3 It has also been demonstrated within this Planning Statement and the other submitted reports and assessments that the application proposals comply with relevant local planning policies and are supported by Welsh national planning policy and tourism objectives.

5.4 There are no other material considerations that would outweigh the planning benefits of the proposals. Any negative impacts upon the landscape and the Conservation Area are minor and can be mitigated. The planning balance is weighed strongly in support of the application proposals. Wrexham County Borough Council is therefore respectfully requested to support this proposal.