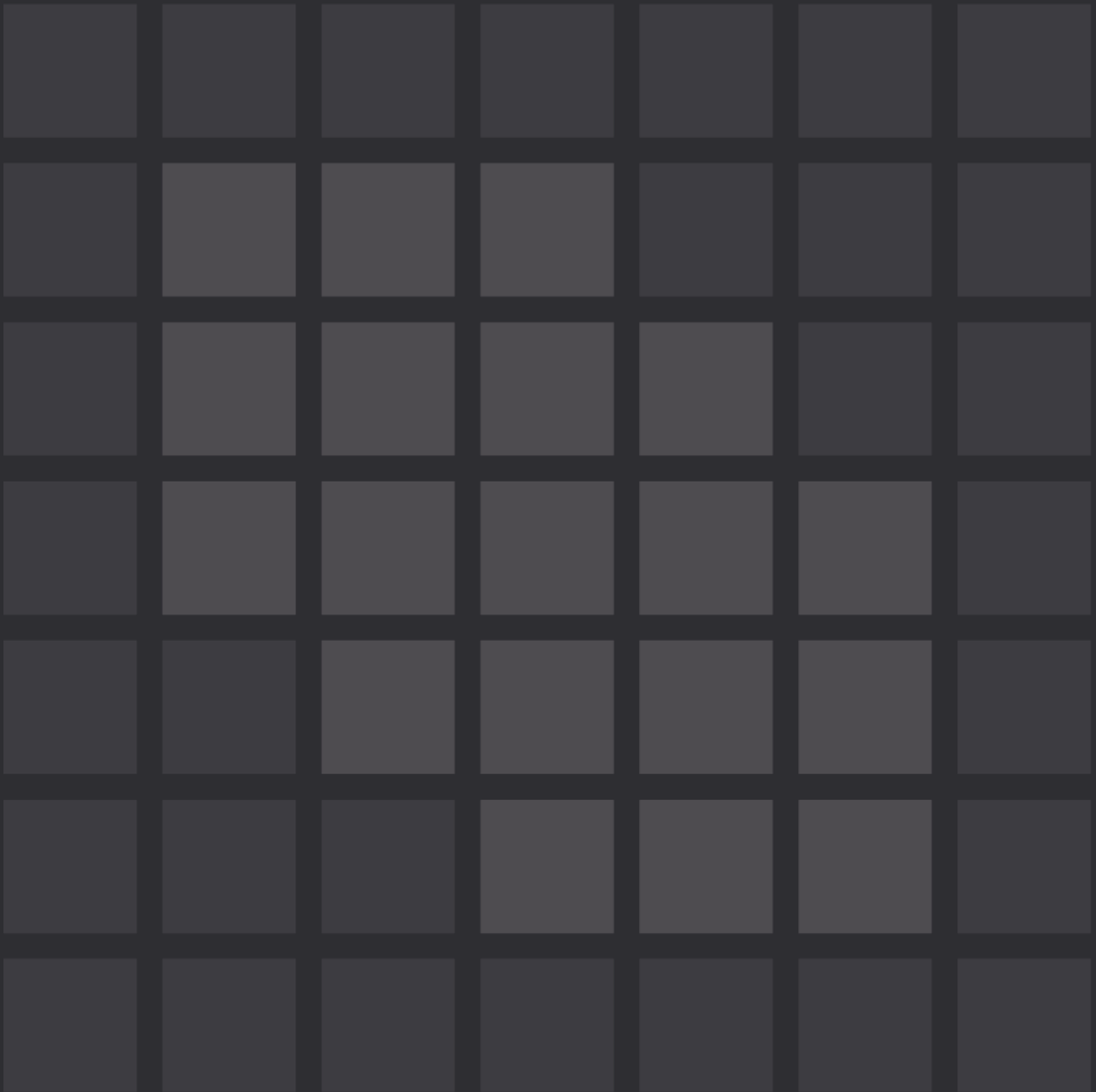




PLANNING STATEMENT

LADY MARGARET'S PARK CARAVAN CLUB SITE
CARAVAN AND MOTORHOME CLUB (CAMC)



Rural Solutions

PLANNING STATEMENT

LOCATION

LADY MARGARET'S PARK CARAVAN CLUB SITE

PROPOSAL

EXTENSION OF EXISTING CARAVAN SITE CONSISTING OF
CARAVAN PITCHES WITH TARMAC ROAD, GLAMPING UNITS,
SAFARI TENTS, CAR PARK, LINEN STORAGE SHED AND PATHS
LINKING TO UNITS

APPLICANT

CARAVAN AND MOTORHOME CLUB (CAMC)

ISSUE DATE

21ST OCTOBER 2021

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CONTENTS

1. INTRODUCTION AND APPROACH	6
2. SITE AND SURROUNDINGS	7
3. THE APPLICATION	14
4. PLANNING POLICY POSITION	18
5. ASSESSMENT OF KEY PLANNING ISSUES	20
6. CONCLUSIONS	24

I. INTRODUCTION AND APPROACH

- I.1: This Planning Statement accompanies a planning application to Wrexham County Borough Council (WCBC) submitted by the Caravan and Motorhome Club (CAMC) in relation to Lady Margaret's Park Caravan Site, Chirk.
- I.2: The statement should be read in conjunction with the detailed Design and Access Statement provided by CAMC.
- I.3: CAMC intends to bring forward the development in the first half of 2022. On that basis, it requests from WCBC both a prompt determination of the application and ongoing engagement on the application in order to ensure that if additional information is required, that this can be provided during the determination of the application, to avoid the need for pre-commencement conditions on any planning consent.

DESCRIPTION OF DEVELOPMENT

- I.4: The proposed development seeks an extension to the established existing touring caravan site. As referenced within the accompanying Design and Access Statement the development will comprise:
- Installation of 15 glamping units of varying types, including two fully accessible units;
 - Car park for glamping area and timber clad linen store to service the units;
 - 15 new all-weather touring caravan and motorhome pitches; and
 - New service point.

APPLICATION DOCUMENTS

- I.5: In addition to this Planning Statement and CAMC's Design and Access Statement, other documents submitted with this application include:
- Plans of proposals and site;
 - Landscape scheme;
 - Ecology report;
 - Heritage assessment; and
 - Tree report.

2. SITE AND SURROUNDINGS

LOCATION

- 2.1: Lady Margaret's Park is a popular all year freehold site that currently provides 103 pitches as well as a number of storage pitches and is located 10 miles south of Wrexham. The site operates all year and has proved to have a healthy following with the membership. Lady Margaret's Park Caravan Site is located to the west of the town of Chirk, as identified in the aerial image below.
- 2.2: The site proposed for the extension of the site is located immediately to the east of the existing caravan site. The field is currently used for a number of caravan rallies each year and informal recreation.



Figure 1: Location of site to the west of Chirk.



- 8



Figure 3: Application site viewed from north-west corner.



Figure 4: Application site viewed from northeeast corner.



Figure 5: Application site viewed from south-east corner.



Figure 6: Application site viewed from south-west corner.

- ## DESIGNATIONS

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- A detailed map of the Chirk/Y Waun area. The map shows a mix of residential streets, industrial areas, and green spaces. Key landmarks include the 'Industrial Estate' on the left, a 'Sports Ground' and 'Recreation Ground' in the center, and several schools and a library in the upper right. A large green area on the far left is labeled 'Golf Course'. A red dashed line runs along the bottom, likely representing a river or a major road. The map is titled 'CHIRK / Y WAUN' in the center and 'OSWESTRY BOROUGH' at the bottom.

2.7: The site is identified as being within a Special Landscape Area, as designated by WCBC and adjacent to the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB).

2.8: There are no heritage assets on the site but there are several heritage assets within the vicinity of the site, including the Pontcysyllte Aqueduct and Canal World Heritage Site, Chirk Conservation Area, two Registered Historic Parks, listed buildings, and Scheduled Ancient Monuments. A comprehensive description of each of these assets is included within the accompanying Heritage Statement.

¹ <https://www.crashmap.co.uk>

- 2.9: The site lies c. 230m from the River Dee and Bala Lane SAC and River Dee/Afon Dyfrdwy SSSI. The site also lies c.240m from Chirk Castle and Parkland Site of Special Scientific Interest (SSSI).
- 2.10: The site is located within Zone A and is considered to be at little or no risk of fluvial or coastal/tidal flooding as identified by Natural Resource Wales.

PLANNING HISTORY

- 2.11: A review of the WCBC planning register (October 2021) confirms there have been a number of planning applications associated with Lady Margaret's Park Caravan Site in recent years.

Reference	Description	Decision
P/2021/0481	Alterations to existing caravan park including new pitches, alterations to existing pitches, new toilet block, compounds, water tank, service points, widening of internal road and new security barriers.	Pending
P/2019/0143	Construction of wardens accommodation (for sole use of the club's wardens).	Approved 07/11/2019
P/2013/0733	Development of extension land to existing site to provide new tarmac roads, 47 all-weather hardstanding pitches, service points, new toilet block, associated services including distribution of mains water and foul drainage and new planting.	Approved 29/12/2014 (lapsed)

- 2.12: The above planning history confirms the CAMC's commitment to investing in the site at Lady Margaret's Park.
- 2.13: The recent application approved in December 2014 confirms that the principle of extending the site into the proposed field can be considered acceptable by the council. This application seeks to respond positively to the planning constraints referenced above to provide a well-considered extension to the existing caravan site.

PRE-APPLICATION ADVICE

- 2.14: A formal pre-application enquiry was submitted to WCBC by CAMC in May 2021. Formal comments were received from WCBC dated 13th August 2021 (a copy of this pre-application response is submitted with this application as an appendix to this document).
- 2.15: The response confirms that whilst the development of new caravan sites within a Special Landscape Area and AONB would be contrary to policies, as an extension of an existing site where planning permission for a similar development has been granted recently, it is considered that the principle could be acceptable subject to consideration of detailed issues.
- 2.16: The feedback confirms that the application should be supported by the following documents:
- Plans of proposals and site;

- Ecology report;
- Heritage assessment;
- Tree report;
- Landscape scheme; and
- Planning statement

2.17: This application has sought to respond positively to the pre-application comments received from WCBC and includes the required documents.

3. THE APPLICATION

3.1: As referenced within the accompanying Design and Access Statement, the proposed site will be used as a touring caravan and glamping site as an extension to an established existing touring caravan site at Lady Margaret's Park.

3.2: The development will comprise:

- Installation of 15 glamping units of varying types, including two fully accessible units;
- Car park for glamping area and timber clad linen store to service the units;
- 15 new all-weather touring caravan and motorhome pitches; and
- New service point.

Glamping Area

3.3: The proposals include the installation of 15 glamping units of varying types.

3.4: Two of the units will be Equality Act compliant with ramped access plus sufficient space and facilities for wheelchair use. These will have a dedicated parking space next to the unit to allow for ease of access for those with impaired movement.

3.5: Ten of the glamping pods, provided by Modpod, will be contemporary in design and appearance, providing an attractive contrast to touring caravans and motorhomes also using the site. Two of these units will be Omnipods with ramped access to allow those with mobility issues to use them.

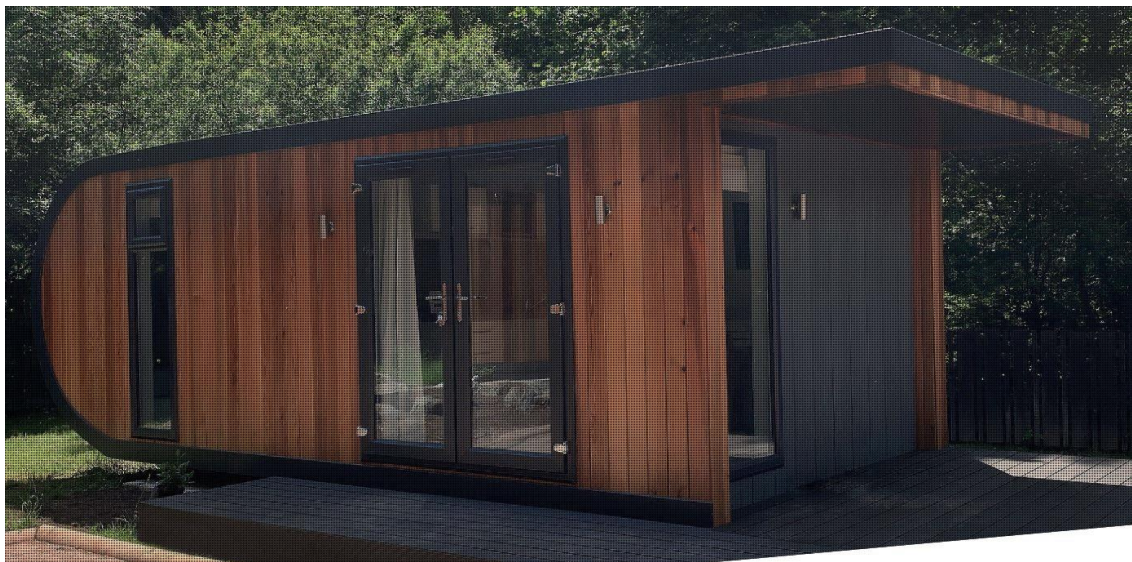


Figure 8: Proposed Modpod.



Figure 9: Proposed Omnipod Accessible Pods.

- 3.6: Three en-suite safari tents will also be installed to maintain a good mix of different options for visitors.



Figure 10: Proposed Safari Tent.

- 3.7: A mix of sizes and berth numbers will be installed to keep the offering as broad as possible to appeal to the widest range of people possible, be it couples, families or groups of friends.
- 3.8: The glamping pods will be located on individual porous stone chipping bases (matching the stone-topped touring pitches in appearance) with access via macadam footpaths. The paths will be sufficiently wide for wheelchairs and

double buggies and will be located within an attractively landscaped wildflower meadow area.

- 3.9: Parking to the standard units will be provided in a separate macadam car park located close to the extension field entrance. In addition to the parking for the glamping units, two additional spaces with electric vehicle charging facilities will be constructed to cater for the growing popularity of this type of vehicle.
- 3.10: Installation of the glamping pods is part of a drive by the club to diversify visitors to its sites. They will allow those who do not own a caravan or motorhome to visit the site and also provide the opportunity for extended families where, perhaps, grandparents who do own a touring unit but their children do not, to stay on the site and enjoy a holiday together.
- 3.11: Provision of the glamping pods represents a sustainable form of development and its modest scale sits comfortably within the overall touring caravan site. It is considered to be beneficial in terms of supporting the local community and services by bringing a different type of visitor to the site than would otherwise use the caravan site.

Linen Store

- 3.12: To service the glamping units a linen store will be constructed to store cleaning equipment and all the spare consumables necessary to manage and operate the units. This will be a flat-roofed timber constructed store with vertical timber cladding.

All-Weather Pitches

- 3.13: The club has found through extensive testing and evaluation that its current design of all-weather pitch offers the best access to those with mobility issues and their installation will offer a high level of usability as required under the Equality Act.
- 3.14: All-weather caravan pitches are especially popular with the elderly, who make up a large proportion of CAMC membership, as they offer a more uniform pitching surface than grass.
- 3.15: The pitches are constructed using loose stone chippings resulting in a free-draining medium that allows continual use during periods of inclement weather. They are a porous surface and do not result in any increased flood risk. The stone chippings will be to match the existing ones already present on site.
- 3.16: It is proposed to install 6 new all-weather pitches, one replacing the existing motor van waste point to the north of the site and a further five replacing existing grass pitches.

Service Point

- 3.17: A service point will be installed to cater for the touring pitches providing water and waste disposal.

Drainage

- 3.18: Foul drainage will be dealt with via the existing connection to the main sewer in the north-east of the site, towards Chirk Station.

Lighting

- 3.19: Keeping external lighting to a minimum is a policy the Caravan and Motorhome Club actively follows on its sites as it reduces potential disruption to site visitors at night. Despite this, a level of external lighting is required on sites for health and safety purposes to allow for the safe movement of pedestrians at night.
- 3.20: The extension will be lit with low level 1.1m high lighting bollards throughout, all of which are 3w led luminaires that direct light downwards. They will be located at key points to allow for safe pedestrian transition around the site.
- 3.21: Each glamping pod will have an external light controlled by a PIR and photocell to come on only when necessary to allow visitors to negotiate the ramps or steps up to the decking areas.
- 3.22: The service point will have three water point bollards, two 1.1m high and one 1.3m high, each again lit with a 3w LED luminaire and a shroud to direct light downwards. These low-level lights are necessary to allow people to use the service point safely at night.
- 3.23: Each caravan pitch electrical hook-up point will have a single 3w low-level LED light which will illuminate the location of the electrical cables where they rise off the ground and present a trip hazard. On the standard non-serviced pitches these lights will be shared between pitches to reduce their number. These again are 1.1m high and with all other lighting proposed are shrouded to project the light downwards.

Planting/Landscaping

- 3.24: Significant landscaping will take place as part of the development including indigenous species planting, predominantly to the boundaries, and a sizeable portion of the site will be given over to a wildflower meadow interspersed with native trees. Details of which are provided within the accompanying Landscaping Plan.

4. PLANNING POLICY POSITION

LOCAL PLANNING POLICY

Adopted Development Plan

- 4.1: The current Development Plan is the Wrexham Unitary Development Plan, which was adopted in February 2005. The following policies of the Wrexham Unitary Development Plan are considered relevant to this application:

General Development Policies

- GDPI General Development Principles
- PS2 Impacts of development

Heritage Policies

- EC7 Conservation Areas
- EC9 Listed Buildings
- EC11 Archaeology
- Local Planning Guidance Note 33 World Heritage Site

Landscape Policies

- EC5 Special Landscape Areas
- Local Planning Guidance Note 7 Landscape

Ecological Impacts

- EC4 Trees hedgerows and woodlands,
- EC6 Biodiversity
- Local Planning Guidance Note 17 Trees
- Local Planning Guidance Note 32 Biodiversity

Drainage

- EC13 Surface water run-off

Tourism Policies

- CLF9 Visitor accommodation
- CLF10 Touring caravan and camping sites

NATIONAL PLANNING POLICY

- 4.2: National planning policy in Wales is currently steered by Planning Policy Wales (Edition 11, 2021). This guidance is supplemented by a series of Technical Advice Notes (TANs). The following TANs are considered to be relevant to this planning application:

- TAN5 Nature Conservation and Planning
- TAN12 Design
- TAN13 Tourism

- TAN15 Development and Flood Risk
- TAN24 The Historic Environment

4.3: The following section considers how the proposed development responds to the planning policy position set out above.

5. ASSESSMENT OF KEY PLANNING ISSUES

5.1: As noted earlier in this statement, the applicant CAMC have undertaken a pre-application enquiry with WCBC which confirmed that as an extension of an existing site where planning permission for a similar development has been granted recently, it is considered that the principle of the proposed extension could be acceptable subject to consideration of a number of planning issues. We consider these planning issues to be:

- Heritage;
- Landscape;
- Ecology; and
- Flood Risk and Drainage.

5.2: We consider these issues in detail below.

Heritage

5.3: The application is supported by a Heritage Statement prepared by Hinchliffe Heritage. This Heritage Statement has found that the proposed development will have no direct impact on any heritage assets. It has also found that it will have no impact whatsoever on the setting of most of the surrounding heritage assets, due to:

- a) The modest nature and small scale of the development; and
- b) The separation between the application site and the heritage assets by distance, intervening buildings and trees and the effects of the topography of the area.

5.4: It has found that the only adverse impacts are a negligible/minor adverse magnitude of impact caused by the sight of the camping facilities on the setting of two heritage assets. This equates to neutral/slight adverse significance of effect when the low significance of the heritage assets is factored in. The two heritage assets are the designated Chirk Castle Historic Park (although the part affected is outside the formal boundary of the site) and the former Ceiriog tramway, which is a non-designated heritage asset.

5.5: However, the Heritage Statement has found that the landscape proposals to implement indigenous woodland planting, the retention of all existing trees and shrubs, including the specific protection of an existing oak tree will have a beneficial significance of effect on the setting of all of the heritage assets, to a greater or lesser degree. It has also found that the formation of new pedestrian access onto the existing footpath will have a slight beneficial significance of effect on the spur of the woodland and the former tramway by improving access to

them and enabling a better appreciation of them. The net impact of the proposed development on the setting of the heritage assets will be beneficial.

- 5.6: Importantly, none of the key characteristics, views or "Sense of Arrival" of the Pontcysyllte WHS will be harmed in any way by the proposed development. Indeed the proposal will provide temporary accommodation to enable more visitors to come to stay in the Buffer Zone and to appreciate the Outstanding Universal Value (OUV) of the WHS. This is a major public benefit of the proposal.
- 5.7: The proposal represents sustainable development and accords with all local and national heritage policy, in particular EC7, EC9, EC11 and TAN24, and so this Heritage Statement makes the case that the proposals should be considered favourably and that the applications should be approved without delay.

Landscape

- 5.8: The site is identified as being within a Special Landscape Area, as designated by WCBC and adjacent to the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty. Policy EC5 confirms that within Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape.
- 5.9: The site extends to the east of the existing site at Lady Margaret's Park. The area subject to this application is enclosed by embankment slopes to the west, by woodland and landform along two-thirds of the northern boundary, by trees along the southern boundary and partly by trees and a low-ridge landform, on which a mature oak tree stands, along the eastern edge of the site. The above results in the site being well screened from local vantage points.
- 5.10: The proposed pitches and parking spaces will be at ground level only, the cabins and tents will be a maximum of 3m high and most camper vans and motor homes are also only a max of 3m high. The cabins will be clad in neutrally stained wood and will have some rounded profiles. The tents will be fabric in a neutral mid-brown colour. The cabins and the tents will thus be visually recessive and integrate harmoniously at best or neutrally at worst into the landscape which is dominated and screened by trees and shrubs. The cabins and tents will not be seen from almost any viewpoint from outside the site, except perhaps from a few locations along the public footpath.
- 5.11: The scheme proposes significant tree and hedgerow planting, as set out within the accompanying Site Plan to further bolster the significant screening afforded the site and which will ensure the site is fully integrated into the landscape setting. Accordingly, the camping pitches, cabins, tents and vehicles will have no meaningful visual impact and will not harm the visual setting of the Special Landscape Area in accordance with Policy EC5.

Ecology

- 5.12: A number of local planning policies relate to ecology, biodiversity and/or nature conservation. These are referenced above and are summarised in Table B.I of the accompanying Preliminary Ecological Appraisal (PEA).
- 5.13: The PEA has been undertaken to identify ecological constraints to development, inform recommendations for design, highlight opportunities for ecological enhancement and determine any additional investigation/survey work necessary.
- 5.14: As part of this PEA, a desk study and extended Phase I Habitat survey of the site were undertaken in March 2021. The site comprises one semi-improved grassland field, bordered to the west and north-west by mature woodland, to the east by dense scrub and railway corridor, and south-east by a large garden.
- 5.15: The site lies c. 230m from the River Dee and Bala Lane SAC and River Dee/Afon Dyfrdwy SSSI. The site also lies c.240m from Chirk Castle and Parkland SSSI, however subject to sensitive lighting design, there is not anticipated to be any significant effect on the qualifying features of the designation.
- 5.16: Grassland habitats currently present within the site are generally common and widespread, with the greatest ecological interest associated with the mature woodland and trees at the boundaries of the site. These will be retained and protected alongside proposals. Protected species that may be present include foraging/dispersing bats and nesting birds in woodland, trees and scrub. A sensitive lighting scheme has been designed to minimise impacts to bats and notable invertebrate assemblages. A population of great crested newts is present within 300m; however, they are considered unlikely to be present on-site due to the intervening habitats, with a non-licensed working methods approach considered proportionate to the scale of habitat impact.
- 5.17: Badgers were found to be absent, but a pre-commencement walkover to confirm the conditions remain unchanged is recommended. No overriding constraints to the development of the site have been identified.
- 5.18: Recommendations for sensitive design and ecological enhancement measures that could be delivered as part of development at the site have been provided within the accompanying PEA, which will aid accordance with National Planning Policy and Policy EC4 Hedgerows, Trees and Woodland and Policy EC6 Biodiversity Conservation of the Wrexham Unitary Development Plan.

Flood Risk and Drainage

- 5.19: The site is located within Zone A and is considered to be at little or no risk of fluvial or coastal/tidal flooding as identified by Natural Resource Wales.
- 5.20: Policy EC13 advises that development that would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

- 5.21: The proposed development seeks to incorporate a sustainable drainage system adjacent to all roadways and pitches to provide adequate catchment and attenuation to control runoff. This will ensure the latter does not exceed the grounds permeability characteristics. The pitches are constructed using loose stone chippings resulting in a free-draining medium that allows continual use during periods of inclement weather. They are a porous surface and do not result in any increased flood risk. The stone chippings will be to match the existing ones already present on site.
- 5.22: Foul drainage will be dealt with via the existing connection to the main sewer in the north-east of the site, towards Chirk Station.
- 5.23: It is considered that the proposed extension to Lady Margaret's Park Caravan Site responds positively to the material planning matters identified above. The scheme is considered to comply with the identified policy requirements of both local and national planning policies.

6. CONCLUSIONS

- 6.1: The proposals for the Lady Margaret's Park Caravan Site are brought forward by the Caravan and Motorhome Club (CAMC).
- 6.2: The CAMC wishes to diversify and enhance the facilities at the site in order to meet both the high standards its membership requires and also ensure increased compliance with disability and other regulations.
- 6.3: The proposal seeks an extension to the established existing touring caravan site and will comprise:
- Installation of 15 glamping units of varying types, including two fully accessible units;
 - Car park for glamping area and timber clad linen store to service the units;
 - 15 new all-weather touring caravan and motorhome pitches; and
 - New service point.
- 6.4: A number of benefits will arise from the development proposal, including significant new tree and hedgerow planting as well as retained biodiversity areas; increased patronage resulting in economic benefit to the town and wider district, and a variety of accommodation types to cater for varied clientele.
- 6.5: The proposed development is considered to comply with the relevant development policies of the Wrexham Unitary Development Plan, as well as policy guidance in the National Planning Policy Framework.
- 6.6: For the above reasons it is considered that the application should be brought forward for approval by Wrexham County Borough Council.
- 6.7: Together with the applicant, we look forward to engaging with WCBC during the determination of the application and providing any clarification of additional information as required.
- 6.8: As noted earlier in the statement, the applicants intend to undertake works in early 2022 so requests that the application is determined promptly with engagement with the applicant throughout the application process should additional information or clarification be required.

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