
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

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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 north of 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. Insufficient information has been submitted with the application to demonstrate otherwise. 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 reasons for refusing the previous application in terms of the relevant legislation, national policy and the development plan and assesses the merits of this new application in this context.
- 1.4 In addition to this planning statement, the following documents have now been prepared and are submitted in support of this planning application:

Site Layout Plan	Enzygo
Design and Access Statement	RLPP
Pre-application Consultation Report	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
Arboricultural Impact Assessment
Arboricultural Method Statement
Tree Protection Plan

Elizabeth Barrett
Urban Forestry Group
Urban Forestry Group
Urban Forestry Group

- 1.5 Whilst the majority of these reports have been updated to address the current application proposals, it is noted that the accompanying arboricultural reports relate to the larger-scale, lodge scheme. However, in view of the reduced scale and nature of the current touring park proposal, it is contended that these reports provide a robust assessment 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 comprises the Wrexham UDP. Whilst the 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 (2013 to 2028) commenced on 3rd September 2019. Given the stage that this draft plan has reached, limited weight can be attributed to the emerging 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 following Assessment.

4. ASSESSMENT

4.1 This application seeks outline planning permission for a touring caravan park (10 pitches), the erection of an amenity building and ancillary works. It is a new proposal following refusal of planning permission on the grounds stated in para 1.2 of this statement. This Assessment addresses the reasons for the previous planning refusal.

Principle of Proposed Development

4.2 Reason for Refusal 1 states:

“The proposal, by virtue of its proximity away from the existing served accommodation of the Hanmer Arms, as well as its self-servicing nature, is not considered would 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. There are no material considerations associated with the application to warrant departing from local plan policy. The principle of development is considered to be unacceptable.”

- 4.3 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 proposal is UDP Policy CLF10: “Touring Caravan and Camping Sites”. It supports the provision of new touring caravan and camping sites, provided that:
- a) the site is unobtrusive and well screened without the need for additional strategic landscaping; and
 - b) the site is not located within a green barrier or Special Landscape Area; and
 - c) the site is used for touring purposes only and is not used for the storage of caravans which are not in use.
- 4.4 Emerging Policy EM5: “Visitor Accommodation Outside Settlement Limits”, also supports new touring caravan and camping sites provided that:
- a. The scale, form and location of the development does not have a harmful effect on the character of the countryside.
 - b. The site is used for touring purposes only and not for the storage of caravans which are not in use.
- 4.5 Touring caravan sites and camping will also generally be supported provided they are acceptably located and screened and provide adequate access and servicing.
- 4.6 It is noted that the emerging policy provides greater flexibility with regard to screening than UDP Policy CLF10. The accompanying reports demonstrate that the application proposals will not have an adverse impact upon the local landscape, Hanmer Conservation Area, wildlife habitats or other features of acknowledged importance. The application site has adequate access and servicing. It will not be used for the storage of caravans. Visitors will use local facilities, including Hanmer Arms, for meals and refreshment.
- 4.7 It is noted that, unlike Policy CLF9 upon which the principle of the previous application was judged, Policy CLF10 and emerging Policy EM5 do not limit provision to the extension of existing facilities in rural areas in respect of caravan parks. Nor do they restrict such development to within Settlement Limits. This is further supported by guidance encouraging tourism contained within PPW which is supportive of tourism and rural diversification. It is therefore contended that the application proposal accords to Development Plan policy and national policy in this regard.

- 4.8 The local visitor economy helps to sustain the local community and businesses (Hanmer Arms, village shops: butcher, post office) in terms of income and jobs. In the absence of a range of accommodation facilities, visitors are staying elsewhere, including in Shropshire and Cheshire, which means that the local, Welsh economy is not maximizing its potential returns from visitors to the area. The application proposals will support increased investment in both Hanmer Arms and village businesses.
- 4.9 Emerging Policy SP9 also 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.”
- 4.10 The site's location, close to the A539, offers an easily accessible base to explore the wider area. The proposed touring park 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.
- 4.11 It is contended that the application proposal accords to the principal development plan Policy CLF10 in this regard. There is not an “in-principle” policy presumption against the application proposals.
- 4.12 Reason for refusal 2 states:
“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. Insufficient information has been submitted with the application to demonstrate otherwise. The proposal would conflict with UDP Policy GDP1 and CLF9.”
- 4.13 The accompanying reports demonstrate that the application proposals will not have an adverse impact upon the local landscape, Hanmer Conservation Area, wildlife habitats or other features of acknowledged importance. In order to fully address this reason for refusing the previous application, the LVIA has been updated to address the current proposal. The plans referred to within the LVIA are submitted as separate documents (LVIA Viewpoints 1-11).
- 4.14 The LVIA identifies the existing landscape character and visual amenity resource, including Hanmer Conservation Area and nearby listed buildings. It considers the likely

effects of the proposals upon 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. It concludes that the site has capacity to accommodate the proposed development 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 which will provide additional screening and a new field boundary hedge to enclose the eastern boundary.

4.15 As previously indicated, Policy CLF9 isn't relevant to the current application proposal. The requirements of Policy GDP1 (*italics*) have been addressed as follows:

- a) *Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords to the character of the site and makes a positive contribution to the appearance of the nearby locality.* This has been addressed in the accompanying DAS and will be dealt with further at the Reserved Matters stage.
- b) *Take account of personal and community safety and security in the design and layout of development and public / private spaces.* This has been addressed in the accompanying DAS and will be dealt with further at the Reserved Matters stage.
- c) *Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.* The Site Layout has taken these factors into account.
- d) *Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.* This has been addressed in response to the Highway Officer's comments on the previous applications and is incorporated into the current application proposals.
- e) *Ensure that built development is located where it has convenient access to public transport facilities and is well related to pedestrian and cycle routes.* There are accessible bus stops in Hanmer, within a short walk from the site. The DAS has considered local pedestrian and cycle routes.
- f) *Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air.* This has been addressed in the supporting technical reports.
- g) *Secure public services* – Utility services are accessible from the site.
- h) *Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.* This is addressed in the accompanying wildlife and habitat reports which have been updated with an addendum to address the current proposals.
- i) *Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination.* The accompanying drainage

strategy addresses flooding and drainage issues. Soil erosion, landslides and contamination are not directly relevant to this proposal.

- j) *Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity.* The site is not located within one of the language sensitive wards identified within Local Planning Guidance Note 31 'The Welsh Language and Welsh Communities'.
- k) *Secure the development of sustainable communities.* Clearly the proposal supports this aspiration, which is further addressed later in this Statement.

4.16 It has therefore been comprehensively demonstrated that the application proposals accord to the relevant parts of UDP Policies GDP1 and CLF10 in so far as they remain relevant.

Compliance with other Policies

4.17 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 UDP 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 have also been addressed earlier in this Assessment.
- 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 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. This is addressed under Reason for Refusal 4 of this Assessment.
- 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/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 under “Reason for refusal 1” in this Assessment. However, given the greater emphasis on sustainability in PPW, this is further addressed later in this assessment.

- 4.18 Emerging 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.
- 4.19 Policy EC7 advises that, near conservation areas, the priority will be to preserve and or enhance those buildings, structures, streets, trees, open spaces, archaeological remains, views, and other elements which contribute to the unique character of the area. The application site lies beyond the northern boundary of Hanmer Conservation Area. In this location it is characterised by the modern Bowling Green, including floodlighting, and a recently constructed access road to Hanmer Arms.
- 4.20 An updated Heritage Impact Assessment & Statement of Significance is submitted in support of this application. It concludes that no designated buildings or features would be detrimentally impacted by the proposed development. It advises that, in view of the proposed scale and siting of the touring pitches and the amenity building, and by additional planting, it would not have an adverse impact on the Conservation Area.
- 4.21 Policy EC9 advises that alterations or additions to, and development or redevelopment within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures. Whilst this policy only refers to development within the curtilage of such buildings more recent guidance requires account to be taken of their broader setting.
- 4.22 Technical Advice Note (TAN) 24 requires local planning authorities to give special attention to the desirability of preserving or enhancing Conservation Areas when taking planning decisions. Emerging Policy SP16 also supports development where it conserves, protects and enhances cultural and heritage assets and their settings.
- 4.23 The Heritage Impact Assessment is supplemented by the updated LVIA. The LVIA further defines and analyses the setting of nearby historic assets. It supports the findings of the Heritage Impact Assessment. It is therefore contended that careful consideration has been given to defining and evaluating the potential impact of the application proposals on nearby heritage assets, including Hanmer Conservation Area, St Chads Church and Hanmer Arms. Both the LVIA and Heritage Impact Assessment conclude that the site has the capacity to accommodate the proposed development

and that any resultant effects on landscape and views would be slight and hardly perceptible from the surrounding area.

- 4.24 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.
- 4.25 Emerging 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 no 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.
- 4.26 This issue was addressed to the satisfaction of Officers in respect of the previous application. 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 supported by the following additional assessments:
- Ecological Desk Study Addendum
 - Stage 1 Habitat Regs Assessment Screening Report
 - Drainage Assessment and Strategy
- 4.27 These assessments have considered the potential impact of the application proposals upon Hanmer Mere and other localised natural habitats. The water quality associated with the development's surface water run-off will be managed through a specified treatment train before it discharges to the watercourse on the site's south-eastern boundary. That watercourse runs away from Hanmer Mere in a north-easterly direction. Through assessment of the evidence/information available, together these reports 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.
- 4.28 It is therefore contended that it has been demonstrated that the application proposals do not conflict with other relevant UDP and emerging policies.

Other Material Considerations

National Planning Policy – Sustainable Development

- 4.29 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

- 4.30 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.
- 4.31 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.
- 4.32 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. Here development should be sympathetic in nature and scale to the local environment. This has already been demonstrated earlier in this Assessment.
- 4.33 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."

4.35 This approach is further supported by PPW which provides up to date guidance on tourism related development. At para 5.5.2 it advises:

“The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities. The planning system can also assist in enhancing the sense of place of an area which has intrinsic value and interest for tourism. In addition to supporting the continued success of existing tourist areas, appropriate tourism-related development in new destinations is encouraged. In some places however there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.”

Social Role

4.36 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

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

4.38 The application proposals represent an effective 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.

4.39 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.

4.40 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 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 proposed small-scale, high-quality touring caravan site accords to many of the objectives set out in PPW and the Welsh Government Strategy for Tourism. It will deliver new visitor accommodation that will be sensitively designed to respond to its rural context. It will assist in improving the range of the local accommodation product and attract a greater number of overnight visitors - creating jobs both on-site and indirectly in the wider local economy.

5.3 In addressing the reasons for refusing the previous planning application, it has been demonstrated that the application proposals now comply with relevant local planning policies and are supported by Welsh national planning policy and tourism objectives. Given that the UDP is out of date, these are important material considerations that carry substantial weight in considering the planning balance.

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.