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

The siting of 19 no. Holiday Lodges, the erection of a Reception Building and Ancillary Works

Planning Statement

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004

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Client:
Carlton Property Holdings Ltd

Date:
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1. INTRODUCTION

1.1 RLPP has been instructed to submit this outline planning application for the siting of 19 no. holiday lodges, the erection of a reception building and ancillary works on land adjacent to the Hanmer Arms. It is a re-submission following the refusal of outline planning permission for a similar proposal on 9th January 2019 (ref: P/2018/0965).

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.
3. The application has not adequately defined and analysed the setting of the historic assets in the vicinity which includes the Hanmer Conservation Area, St Chads Church and the Hanmer Arms, in order to evaluate the potential impacts of change upon their setting. The proposal would conflict with UDP Policies EC7 and EC9 as well as the provisions set out within CADW Guidance 'Managing Setting of Historic Assets in Wales'.
4. Insufficient information has been submitted to enable an assessment of the impact of the development on the Hanmer Mere. The proposal would fail to accord with UDP Policy EC6.

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 (including several newly commissioned reports). 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
Site Contours Plan	Enzygo
Design and Access Statement	RLPP
Heritage Impact Assessment & Statement of Significance	Enzygo
Landscape and Visual Impact Assessment*	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
Tree Protection Plan	Urban Forestry Group
[*New report]	

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. Due weight should be given to relevant policies in the out of date UDP according to their degree of consistency with national policy.

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 CLF9	Visitor Accommodation outside Settlement Limits
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:

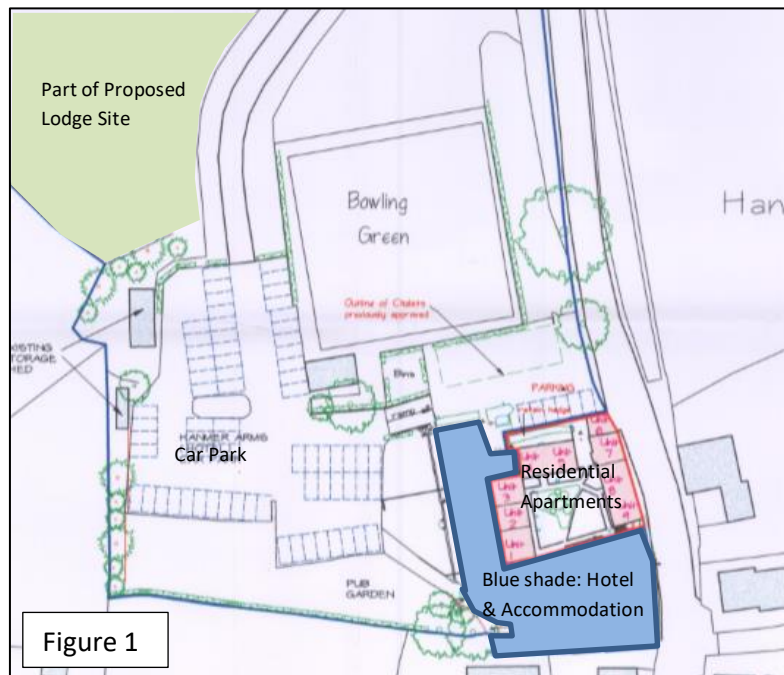
“Up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making. Plans at all levels of the development plan hierarchy must be prepared in accordance with national planning policies. Planning applications must be determined in accordance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

3.3 The implications of the above policies are addressed in the Assessment Section of this Planning Statement.

4. ASSESSMENT

- 4.1 This application seeks outline planning permission for the siting of 19 no. holiday lodges, the erection of a reception building and ancillary works. It is a re-submission 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.
- 4.2 **Reason for refusal 1 states:**
"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."
- 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 application proposal is UDP Policy CLF9. This policy advises that visitor accommodation outside settlement limits will only be permitted through the conversion of existing buildings and by extensions to accommodation. It advises that extensions to accommodation will only be permitted where:
- a) existing buildings are fully utilised and incapable of further adaptation; and
 - b) the proposed extension is appropriate in scale and design to the existing building and does not have an adverse impact on the local landscape, green barrier or other features of acknowledged importance.
- 4.4 Figure 1 on the following page comprises an extract of the approved plan for the 9 no. apartments (ref: P/2012/0854) that has now been implemented. It demonstrates that the land and buildings in the immediate vicinity of Hanmer Arms are fully utilised.
- 4.5 Policy CLF9 supports the development of visitor accommodation outside settlement limits in certain circumstances, including by extensions to existing accommodation. However, contrary to what is inferred in the reason for refusal, Policy CLF9 does not restrict the type of extension that could form new visitor accommodation, nor does it require it to mirror what is already available.
- 4.6 The application site falls within the same land holding as Hanmer Arms and is also owned by the applicants. It utilises the same private access road as Hanmer Arms. The fact that the proposed holiday lodges are located beyond the existing Hanmer Arms development does not mean that a new, separate business is being proposed

(as per Policy CLF9). The application proposal seeks to diversify and extend the range of visitor accommodation available at Hamner Arms.



4.7 Hanmer Arms has been under new management for the last two 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.

4.8 The existing visitor accommodation comprises 11 en-suite double rooms located within a converted stable block. The occupancy rate for this accommodation is currently 70-80% and is often fully booked at peak times, particularly during the “wedding season” and special events. Existing buildings are fully utilised/occupied, including the residential apartments granted planning permission under P/2012/0854. There is insufficient space available within the immediate grounds of Hanmer Arms to accommodate the proposed extension/diversification to the business.

4.9 Whilst the proposed lodges do not comprise “serviced” accommodation, this isn’t the relevant policy test. Visitors will also use local facilities, including Hanmer Arms, for meals and refreshment. 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.”

4.10 PPW guidance provided at para 11.1.7 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.”

4.11 It is noted that, unlike Policy CLF9, the up to date guidance regarding encouraging tourism contained within PPW does not limit provision to the extension of existing facilities in rural areas. Given that the relevant UDP Policy CLF9 is significantly out of date, greater weight should be afforded to up to date PPW guidance which is supportive of tourism and rural diversification.

4.12 Industry evidence demonstrates that pubs are continuing to close at an alarming rate across Wales. Last year, the Campaign for Real Ale (CAMRA) advised that 18 pubs were continuing to shut every week in the UK, and that North Wales had lost dozens of pubs over the last five years. Pubs in rural areas are closing at a much faster rate than those in urban areas and leaving many communities without this key community service. The whole sector is struggling with business rate rises, high taxes and the minimum wage increases. For the traditional pub it is about innovation and being very good at what you do and look to capitalise on opportunities to attract new customers and income sources.

4.13 With regard to “Pubs and the Rural Economy”, CAMRA’s response to the House of Lords Select Committee on the Rural Economy (September 2018) advised that:

- i. Pubs play an essential role in the rural economy; contributing vital services, employment opportunities, demand for local produce, and a space to socialise thereby tackling social isolation.
- ii. The Institute for Public Policy Research found that pubs boost the income of surrounding businesses by around £80,000 a year but also generate up to £120,000 worth of ‘social benefit’ to rural areas.

4.14 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. It is being held back due to the lack of suitable self-catering accommodation available locally. 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.

4.15 Emerging LDP2 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.”

4.16 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.”

4.17 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.”

4.18 The main market for holiday lodge rentals in this location is likely to come from within an approximate 1-2 hour drive. Within a 90-minute drive of Hanmer, there is a high proportion of older people (the core market for holiday lodges) as well as more than 2.5 million ABC1 residents. These older and more affluent people typically

drive demand for lodge developments. As well as catchment demographics, the regional visitor profile also provides a good fit with the typical market for timber lodge holidays and is likely to lead to strong demand for the proposed lodges in this location. The proposed development site lies close to the A539, providing excellent accessibility by private car.

- 4.19 The site's location offers an easily accessible base to explore the wider area. At present, the local holiday lodge market supply does not reflect the growing popularity of this type of self-catering accommodation amongst consumers. There is no similar provision within vicinity of Hanmer. The nearest "glamping" and "yurt" site, which provides accommodation popular with younger age group visitors, is approx 5 miles away from Hanmer but is oversubscribed, charging £150 per night. There is a requirement for more self-catering accommodation in the area, particularly that which is suitable for older age groups. 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.
- 4.20 The development proposals accord to up to date national planning policy. They 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.
- 4.21 The accompanying reports demonstrate that the application proposals will not have an adverse impact on the local landscape, Hanmer Conservation Area, wildlife habitats or other features of acknowledged importance. This is further addressed under the assessment of "Reasons for Refusal": 2, 3 and 4 below. It is contended that the application proposal accords to the principal development plan policy in this regard.

Summary

- 4.22 The proposed development of lodge-style, self-catering visitor accommodation at Hanmer Arms will create a high-quality new addition to the area's accommodation stock. It accords to the principal UDP Policy CLF9 (in so far as it remains relevant and consistent with PPW), emerging LPD2 Policy EM5 (only limited weight), up to date national policy as provided in PPW and is supported by the Government's Tourism Strategy. It is therefore contended that the application proposal is acceptable in principle. There is not a policy presumption against the application proposals.

4.23 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."

4.24 In order to fully address this reason for refusing the previous application, a Landscape and Visual Impact Assessment (LVIA) has been undertaken by Enzygo. Their report is submitted in support of this application as a separate document. The plans referred to within the LVIA are submitted as a further separate document (LVIA Appendix D).

4.25 In addition to the somewhat dated UDP Policies GDP1 and CLF9, emerging LPD2 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.

4.26 The 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. 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 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.

4.27 It has therefore been comprehensively demonstrated that the application proposals accord to the relevant parts of UDP Policies GDP1 and CLF9 in so far as they relate to the second reason for refusal.

4.28 Reason for refusal 3 states:

"The application has not adequately defined and analysed the setting of the historic assets in the vicinity which includes the Hanmer Conservation Area, St Chads Church and the Hanmer Arms, in order to evaluate the potential impacts of change upon their setting. The proposal would conflict with UDP Policies EC7 and EC9 as well as the provisions set out within CADW Guidance 'Managing Setting of Historic Assets in Wales'."

4.29 Policy EC7 advises that, in close proximity to 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.

4.30 A Heritage Impact Assessment & Statement of Significance has been re-submitted in support of this application. It concludes that no Designated buildings or features would be detrimentally impacted by the proposed development. It is considered that, with the proposed siting of the lodges and by additional planting, the proposed development would not have an adverse impact on the Conservation Area.

4.31 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.

4.32 Up to date 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 LDP2 Policy SP16 also supports development where it conserves, protects and enhances cultural and heritage assets and their settings.

4.33 Enzygo's Heritage Impact Assessment has now been supplemented by the 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 the Hanmer Arms.

4.34 The application site is located outside of the Hanmer Conservation Area and it is excluded from the Special Landscape Area designation. National and local level planning policy encourages sustainable development in suitable locations that do not have significant effects on the landscape. The proposed development supports this in that it will be located on a site where landscape and visual effects will be minimised. 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.

4.35 It is therefore contended that it has been demonstrated that the application proposals do not conflict with UDP Policies EC7 and EC9, emerging LDP2 Policy SP16 and the CADW Guidance.

4.36 **Reason for refusal 4 states:**

"Insufficient information has been submitted to enable an assessment of the impact of the development on the Hanmer Mere. The proposal would fail to accord with UDP Policy EC6."

4.37 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.

4.38 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.

4.39 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 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.

4.40 This planning application is supported by the following additional assessments that directly address this reason for refusing the previous application:

- Ecological Desk Study Addendum Enzygo
- Stage 1 Habitat Regs Assessment Screening Report Enzygo

- 4.41 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.
- 4.42 It is therefore contended that it has been demonstrated that the application proposals do not conflict with UDP Policy EC6.

Compliance with other Policies

- 4.43 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 are further addressed under "Reasons for refusal 2 and 3" 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 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. 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 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 under “Reason for refusal 1” in this Assessment. However, given the greater emphasis on sustainability in PPW, this is further addressed separately later in this assessment.

4.44 It has therefore been demonstrated that the application proposals comply with other relevant Local Plan policies.

Other Material Considerations

National Planning Policy – Sustainable Development

4.45 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

4.46 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.

4.47 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.

4.48 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.

Social Role

4.49 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

- 4.50 PPW para 5.6.11 advises that diversification activities should be supported where there is no detrimental impact on the environment and local amenity.
- 4.51 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.
- 4.52 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.
- 4.53 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.

Fallback Position

- 4.54 It should be noted that the proposed holiday lodges are effectively static caravans, i.e. they are not permanent structures. Their regulation and management are dealt with under Caravan Sites and Control of Development Act 1960. Emerging LPD2 Policy EM5 permits proposals for visitor accommodation outside settlement limits, specifically supporting new touring caravan and camping sites. This represents a realistic alternative to the proposed lodges.
- 4.55 In respect of the siting of the proposed holiday lodges, the application proposal comprises a similar use of the land as a touring caravan site. In terms of traffic generation, the application proposals would have far less impact upon the local highway network than provision for touring caravans. In comparison with what could be permissible in terms of a touring caravan site, the proposal is relatively small-scale and low impact.

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 holiday lodge development 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 quality 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 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. 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.