
Planning, Design and Access Statement

Three Cliffs Bay Holiday Park, North Hills Lane, Penmaen,
Gower SA3 2HB



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Town and Country Planning Act 1990

Planning Application for:

- a) Regularise an extension to the northern element of the site;
- b) Relinquish a commensurate area of the southern element of the site in exchange;
- c) 19 timber bases measuring 6m x 5m between 1st March and 31st October and removed from the site during the closed season
- d) Relocating 36 tent pitches from the southern camping field to the northern camping field (including 19 yurt-style tents);
- e) Relocating 19 tent pitches from the southern camping field to the adjoining touring element;
- f) A uniform 1st March to 31st October season across the whole park;
- g) Bicycle Storage;
- h) Regularise ancillary development; and
- i) Proposed landscaping

At Three Cliffs Bay Holiday Park, North Hills Lane, Penmaen, Gower SA3 2HB

For Mr D M Beynon

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Location Plan 1:2500 scale @ A4

Proposed Site: Layout and Site Context Plan 1:500 scale @ A1

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Appendices

Appendix 1 - Tourism Needs and Development Impact Assessment

Supporting Documentation

Visual Appraisal and Design Report (March 2020) by Land Studio

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1. Introduction

- 1.1. This Planning, Design and Access Statement sets out the principle of this planning application and provides additional background information in support of the proposed development.
- 1.2. The Planning, Design and Access Statement has been set out in accordance with the requirements of the Town and Country Planning (GDP) (Amendment) (Wales) Order 2009 and the Technical Advice Note 12 (Design) Guidance on Design and Access Statements 2016.
- 1.3. The subject application seeks consent for the following:
 - a) Regularise an extension to the northern element of the site;
 - b) Relinquish a commensurate area of the southern element of the site in exchange;
 - c) 19 timber bases measuring 6m x 5m between 1st March and 31st October and removed from the site during the closed season
 - d) Relocating 36 tent pitches from the southern camping field to the northern camping field (including 19 yurt-style tents);
 - e) Relocating 19 tent pitches from the southern camping field to the adjoining touring element;
 - f) A uniform 1st March to 31st October season across the whole park;
 - g) Bicycle Storage;
 - h) Regularise ancillary development; and
 - i) Proposed landscaping
- 1.4. The subject application has been supported with a Visual Appraisal and Design Report (March 2020) by Land Studio.
- 1.5. This Planning, Design and Access Statement and supporting documentation forms part of the Pre-application Consultation (PAC) process.

2. Three Cliffs Bay Holiday Park

- 2.1. Three Cliffs Bay Holiday Park is located on the southern edge of the Gower Peninsula and is located approximately 14 km south west of Swansea. The park is located to the east of the main cluster of housing development in Penmaen.
- 2.2. The holiday park forms part of Northills Farm which comprises in excess of 100 acres of woods and agricultural land together with the cliffs which lead down to the beach. The farm has been used for tented camping and caravanning since the early 1900's.
- 2.3. The holiday park itself is located at the end of North Hills Lane which then turns into Bridleway PM1. The park straddles Bridleway PM1 with camping to the north and camping and caravanning to the south.

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- 2.4. To the north of the bridleway, the park has planning permission for 35 tented camping pitches. To the south of the bridleway, the park has planning permission for 23 touring caravans and an Established Use Certificate for 75 tented camping pitches.
- 2.5. The applicant is utilising an area of land adjacent to the northern field to accommodate tented camping pitches, a use which has not been permitted by the Council. A number of tented camping pitches in the northern field have also been utilised for yurt-style tent accommodation. These matters form part of the subject application.
- 2.6. The park has been graded 5 stars by Visit Wales principally in relation to the high quality facilities on site together with how well the park is maintained by the applicant. The park is very popular with numerous positive press stories in the industry and certainly shines a positive light on the Gower Peninsula and in this regard, is the only 5 star Visit Wales park on the Gower.
- 2.7. Access to the holiday park is gained via North Hills Lane which, for the main, is a single track road which also provides access to a number of properties on North Hills Lane. It should be noted that vehicular traffic along North Hills Lane stops at North Hills Farmhouse at which point it becomes a bridleway (Ref PM1). The entrance to the park comprises the farmhouse, park shop/reception, holiday cottages and outbuildings.
- 2.8. The site was subject to two planning Enforcement Notices under ref: ENF2014/0416 and ENF2018/0045. Following a successful Appeal, both Enforcement Notices were quashed.

3. Planning History

- 3.1. The site's planning history was discussed at length during the Appeal against Enforcement Notices ref: ENF2014/0416 and ENF2018/0045. The agreed Statement of Common Ground between the LPA and the applicant outlined the planning history in relation to Three Cliffs Bay Holiday Park which forms the following paragraphs
- 3.2. Three Cliffs Bay Holiday Park has a detailed and somewhat complicated planning history dating back to the early 1970s and beyond. The park was previously known as North Hills Farm and has been in the Beynon family ownership for a considerable number of years.
- 3.3. To the north of the lane, in field 6465, there is planning permission under ref 2009/0710 dated 22nd February 2009 for 35 tented camping pitches from Good Friday or 1st April (whichever is earliest) to 31st October (inclusive) in any year with the use of the land for caravans being expressly excluded.
- 3.4. To the south of the lane, planning permission was granted under ref: 391/254/72 dated 14th April 1972 for a site for 20 touring caravans and erection of toilet block; part field 103 near North Hills Farm. This consent was used to obtain the Site Licence which was issued dated 2nd July 1973.

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- 3.5. Also on land to the south of the bridleway, the applicant has an Established Use Certificate Ref: 2/1/78/0935/07 dated 26th October 1978 on field no 6257 for “camping – tents only”. This refers to the section of field no 6257 not covered by planning permission ref: 391/254/72
- 3.6. As a result of Established Use Certificate Ref: 2/1/78/0790/07 and planning permission ref: 391/254/72, the land to the south of the bridleway benefits from two defined areas; one providing tented camping and the other touring caravans.
- 3.7. Part of field no 6257 is subject to an Enforcement Notice served by the Council on the 30th April 1982. The Enforcement Notice states that “no more than 20 caravans shall be sited on the land at any one time and they shall be maintained in a mobile condition and free of any appendages”.
- 3.8. Planning permission was granted, on Appeal, under ref: APP/B6855/C/19/3223225 and APP/B6855/C/19/3223229 for 1) a *mixed use (sui generis) of camping and siting of touring caravans/campervans/motorhomes for holiday purposes and the creation of 3 associated hardstandings; and 2) the creation of hardstandings and tracks/roads respectively.*
- 3.9. The site now has permission for up to 23 touring caravans and 110 tents.

4. Pre-Application Enquiry

- 4.1. A pre-application enquiry was submitted to the LPA in April 2019 for similar development to what is being proposed with this application and was assigned reference number 2019/0944/PRE.
- 4.2. At the time of writing this report, we had not received a response to the pre-application enquiry.

5. The Planning Application

- 5.1. The subject planning application is multi-faceted and follows on from discussions which have been held with the LPA particularly in relation to the alleged unauthorised extension to the northern element of the park together with the siting of timber decking for yurts.
- 5.2. The subject application refers to the following areas:
 - a) Regularise an extension to the northern element of the site;
 - b) Relinquish a commensurate area of the southern element of the site in exchange;
 - c) 19 timber bases measuring 6m x 5m between 1st March and 31st October and removed from the site during the closed season
 - d) Relocating 36 tent pitches from the southern camping field to the northern camping field (including 19 yurt-style tents);
 - e) Relocating 19 tent pitches from the southern camping field to the adjoining touring element;

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- f) A uniform 1st March to 31st October season across the whole park;
- g) Bicycle Storage;
- h) Regularise ancillary development; and
- i) Proposed landscaping

- 5.3. This application provides Three Cliffs Bay Holiday Park with a more simplistic framework to operate and for the LPA to suitably enforce. All previous planning permissions and Established Use Certificates could be relinquished as part of any such approval and replaced with an overarching planning permission. The Site Plan submitted with this application shows:
- a) The northern field will be used for the siting of 71 tents which includes 19 yurt-style tents and 19 timber decking bases between 1st March and 31st October and will be removed from the site between 1st November and the last day of February.
 - b) The southern field will be used for 23 touring caravans and motorhomes and 39 tents between 1st March and 31st October with no more than 20 tents being able to utilise the western element of this field which is the most visually prominent.
- 5.4. The first element of this application seeks to regularise an extension to the northern element of the site amounting to 0.53 ha. The applicant is willing to relinquish 0.68 ha of land on the southern element of the site as part of a compensation package. Therefore, the subject application does not seek consent to extend the site. In fact, if the LPA are mindful to approve this application, there will be a net reduction of site area by approximately 0.15 ha.
- 5.5. It should be noted that the land the applicant is willing to relinquish is considered to be the most visually prominent in the landscape. This relates to land at the park's highest point and land most visible from the coastal path. The areas which will be relinquished will go back to wild which will encourage ecology to flourish.
- 5.6. The applicant seeks to regularise 19 timber bases measuring 6m x 5m (75mm high) which will be sited between 1st March and 31st October and then removed from the site during the 4 month closed period.
- 5.7. As part of this application, the applicant seeks to re-organise the layout and distribution of tents on the site. Of the 75 tents which can be sited on the most visually prominent section of the park to the south of the bridleway, the applicant seeks to relocate 36 pitches to the northern element on the site together with relocating a further 19 tented camping pitches to the adjoining touring caravan area and utilising 19 approved hardstandings for tents. This would leave just 20 tents occupying the most visually prominent area of the site.
- 5.8. The applicant seeks a uniform 1st March to 31st October operating season across the entirety of the site. The majority of the site operates from Good Friday or 1st April (whichever is earlier) to 31st October.

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- 5.9. From our records, the camping field on the southern element of the site operates with two Established Use Certificates with the same reference number, namely 2/1/78/0790/07. The Certificate which is dated 26th October 1978 does not have a seasonal restriction whereas the Certificate which is dated 28 November 1978 specifies a season of Whitsun to 31st October. This issue was not raised in relation to Appeals APP/B6855/C/19/3223225 and APP/B6855/C/19/3223229 in correspondence or at the Hearing as it was not relevant. Therefore, we consider there is ambiguity in terms of how this section of the site can operate. There is great demand for holiday parks to remain open for longer, which in turn, will assist numerous local businesses which are reliant on tourism.
- 5.10. The application seeks to regularise the ancillary development on the site which is located at the entrance to the northern camping field. This ancillary development relates to two water tanks and two gas tanks within a timber clad compound which is used to service the toilet block on the northern element. This ancillary development is, without doubt, essential for the site to function. The applicant has already sought to screen the water and gas tanks with a timber compound and, as such, the applicant seeks to regularise this development.
- 5.11. The shed within the compound houses large water pumps which maintains the water pressure in the amenity block which, for the avoidance of doubt, comprises 21 “power” showers, 25 hand wash sinks, 25 toilets, 8 dishwashing sinks, 2 external showers for cyclists surfers and chemical disposal point.
- 5.12. The applicant also proposes a bicycle storage area on site which will encourage holidaymakers to arrive to the site on bike or, whilst on site, use their bicycle to explore the surrounding area as opposed to relying on the car. A secure cycle rack will be connected to the shed within the compound housing the ancillary development
- 5.13. Finally, the applicant seeks consent for additional landscaping. This relates principally to the new hedgerow on the southern element of the site which will define the camping area and the areas the applicant proposes to relinquish as well as a formalising the hedgerow to the north western boundary.

6. Use

- 6.1. Three Cliffs Bay Holiday Park is, by definition, a holiday park which the applicant strictly enforces.
- 6.2. The applicant would naturally accept any reasonable planning conditions to ensure the site is used for holiday purposes only.

7. Amount

- 7.1. If the LPA are mindful to approve this application, it will result in a net reduction of the overall site area of Three Cliffs Bay Holiday Park. The approved confines of the site extends to approximately 3.1 ha. (7.7 acres). If this application is approved, the approved site area for siting tents and touring caravans will reduce to 2.95 ha. (7.3 acres.).
- 7.2. The applicant seeks to regularise an extension to the northern element of the site which extends to 0.53 ha whilst relinquishing 0.68 ha of land on the southern element. This amounts to a net reduction in site area of 0.15 ha.
- 7.3. Three Cliffs Bay Holiday Park has planning permission for 110 tents and 23 touring caravans and motorhomes together with consent for a toilet/amenity block on the southern element of the site.
- 7.4. The applicant also seeks consent for 19 timber decking bases measuring 6m x 5m, and 75mm high . These timber decking bases will be for the siting of Yurt-style tents and will be removed from the site during the closed season (November to March).
- 7.5. The subject application proposes in excess of 200 metres of new hedgerow planting which will be a significant landscaping and ecological gain. Whilst the applicant has already planted part of the hedgerow on the north western boundary, this will be secured by way of condition.

8. Character (Layout, Scale and Appearance)

- 8.1. Matters relating to Character have been addressed, in detail, within the Visual Appraisal and Design Report prepared by Land Studio which is produced with this planning application. In terms of Landscape Character, the report states:

The entire study area is located in the Gower Area of Outstanding Natural Beauty (AONB) and forms part of National Landscape Character Area 39 'Gower'. The key characteristics of this area include:

- *Gently rolling countryside with a well-balanced relationship between field boundaries, topography and settlement*
- *Wide stretching heathland (downs), being an important feature of the Peninsula*
- *Settlements of whitewashed buildings are linked by a network of minor roads, fringed by high, flower rich verges.*
- *Varied coastline and unspoilt, tranquil and unspoilt views*
- *Established woodland belts helping to create and reinforce a sense of enclosure*

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- 8.2. In terms of the Character of the application site, the Visual Appraisal and Design Report states:

Three Cliffs Holiday Park is a family run business which benefits from an excellent level of landscape maintenance and care. The majority of the camping areas are laid to grass, enclosed by cut, mature, native hedgerows and bordered by a number of woodland and scrub areas. Further to the historic field boundaries, a number of landscape improvements have recently been made with over 200m of new, native hedging having been laid (protected with stockproof fencing) alongside repairs to grass areas and hard standings.

- 8.3. The proposed development is made reference to on the **Proposed Site: Layout and Site Context Plan** produced by Land Studio. Whilst hardstanding pitches and the timber decking bases are shown, we have not shown the specific layout for the tented camping pitches. Moreover, we have shown the number of tents which will be accommodated in a particular area of the site.
- 8.4. In terms of the proposed development, the applicant proposes to, effectively, re-organise the development on site and with reference to Character, this relates principally to relocating 55 tented camping pitches from the most visually prominent section of the site; namely the southern element. These 55 tented camping pitches will be relocated to the camping field to the north (36 No.) and to vacant touring pitches to the east (19 No.).
- 8.5. Whilst there is permission for more hardstanding pitches than there are touring units, the applicant proposes to utilise these hardstanding pitches for the siting of tents. This is a far more beneficial use of the land and, again, removes tents from a far more visually prominent area of the site.
- 8.6. The applicant proposes 19 timber bases measuring 6m x 5m, however, these are sited at ground level and, for the majority of the time, will have a yurt-style tent pitched thereon. Therefore, there would be very little, if any, visual impact arising from the timber bases. Furthermore, during the closed season when tents are not permitted to be pitched, the timber bases will be removed from the site.

9. Access To, From and Within the Site

- 9.1. Three Cliffs Bay Holiday Park is located approximately 14 km south west of Swansea on the southern edge of the Gower Peninsula in the village of Penmaen.

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- 9.2. Penmaen is located on the route of the A4118 which connects Swansea with Port Eynon on the Gower Peninsula. Access to the holiday park is gained via North Hills Lane which, for the main, is a single track road which also provides access to a number of properties on North Hills Lane. It should be noted that vehicular traffic along North Hills Lane stops at North Hill Farmhouse at which point it becomes a bridleway (Ref PM1). The entrance to the park comprises the farmhouse, park shop/reception, holiday cottages and outbuildings. Pennaen is on the route of bus service 118 between Swansea and Rhossili with regular service in both directions.
- 9.3. Within the holiday park, the site is accessed by basic vehicular tracks which were approved as part of Appeals APP/B6855/C/19/3223225 and APP/B6855/C/19/3223229. The site also has 42 existing hardstanding pitches which allow touring caravans to be accessed safely throughout the year.

10. Accessibility

- 10.1. The touring units and tents can be adapted to meet the needs and requirements of less mobile holidaymakers. All facilities provided on site cater for disabled access including provisions within the amenity block.
- 10.2. The topography of the application site is such that no re-grading of the land is required. The proposal is therefore ideally suited to cater for all disabled access.

11. Environmental Sustainability

- 11.1. The subject planning application proposes a number of positive Environmental Sustainability initiatives. Firstly, the creation of over 200 metres of new hedgerows which will create new habitats for nature.
- 11.2. Secondly, the applicant proposes to return nearly 0.7 ha of land back to nature. The applicant keeps the grass on this land very short particularly during the operating season which is not accommodating for wildlife. However, returning this land back to nature will encourage wildlife to flourish.
- 11.3. As part of this application, the applicant proposes bicycle storage which will encourage holidaymakers to cycle to the park. However, the likelihood is most holidaymakers will arrive on site in their own vehicles but the initiative of bicycle storage will at least encourage holidaymakers to use their vehicles less whilst they have pitched up. The applicant also has plans, in the future, for bike hire for holidaymakers on site

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- 11.4. Finally, the site is within easy walking distance of a bus stop on the junction of North Hills Lane and the A4118. Pennaen is on the route of bus service 118 between Swansea and Rhossili with regular service in both directions.

12. Economic Sustainability

- 12.1. Tourism is a significant contributor to the UK economy. According to Visit Britain, since 2010, tourism has been the fastest growing sector in the UK in employment terms, with inbound tourism bringing £24.5 billion into the UK economy through visitor spend in 2017. Britain is forecast to have a tourism industry worth over £257 billion by 2025, which will support 3.8 million jobs. The importance of tourism to the UK economy therefore cannot be underestimated.
- 12.2. In the UK holiday park sector, the UK Caravan and Camping Alliance (UKCCA) estimates there are over 438,000 caravan and camping pitches, almost 152,000 of which are touring caravan and motorhome pitches (UKCCA, 2018). This means that touring pitches comprise over a third of caravan pitches in the UK, demonstrating their popularity and importance to the tourism sector.
- 12.3. UKCCA commissioned an independent economic impact assessment and benefit assessment of the holiday park sector across the UK in 2018, with detailed reports produced for each country within the UK. The Wales report breaks down the economic contribution of all forms of holiday park and camping accommodation to the Welsh economy. It is estimated that visitors to Welsh holiday parks/campsites spent a total of £1.33 billion in the Welsh economy through direct and indirect means.
- 12.4. The tourism strategy for Wales specifically is set out in the 'Partnership for Growth: strategy for tourism 2013-2020' which is aimed at driving higher tourism earnings to deliver maximum value for the Welsh economy. The objectives of this strategy include promoting Wales as a destination through a higher quality tourism offer and extending the tourism season.
- 12.5. Three Cliffs Bay Holiday Park has been graded 5 stars by Visit Wales principally in relation to the high quality facilities on site together with how well the park is maintained by the applicant; in itself a strong driver for visitor demand.
- 12.6. The aforementioned UKCCA 'Economic Impact Assessment and Benefit Assessment Wales 2018' report provides robust data on the contribution holiday and camping parks make to the economy and this is broken down into individual accommodation type.
- 12.7. According to this report, rented and touring accommodation creates a visitor spend of £95 per group per day through on-site and off-site expenditure in Wales (UKCCA, 2018).
- 12.8. Three Cliffs Bay Holiday Park operates on a permitted holiday season of 1 April (or Good Friday; whichever is the earlier) to 31 October to any one year. This is a period of at least 213 days per year in which the site is creating income into the local economy. 35% of 213 days is 74.55. £95 x 74.55 days x 133 (approved tents and touring caravans) equates to £941,939.25; say £940,000

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- 12.9. Using the data provided in the report and basing this upon a conservative average occupancy level of 35% across the holiday season, Three Cliffs Bay Holiday Park creates approximately £940,000 in visitor expenditure into the local economy in any year from the permitted 23 touring caravans and 110 tents on site.
- 12.10. Research by VisitBritain states that every £54,000 spent by tourists in a local economy sustains 1 FTE job. Accordingly, the £940,000 visitor expenditure from the park equates to 17.4 FTE jobs in the local area. There are clearly significant economic benefits to the proposed development in this respect.
- 12.11. It is estimated that there are 898 holiday parks and campsites in Wales, across which a total of 15,943 touring caravan pitches are accommodated (UKCCA, 2018). The Wales report found that touring pitches are the second largest contributor to the Welsh economy through visitor spend, amounting to around £370.7 million and equating to approximately 6,866 full-time equivalent (FTE) jobs. This directly illustrates the strong demand for touring pitches in Wales and the enormous economic contribution touring visitors make.
- 12.12. At a local level, Swansea County Council hold a positive stance towards tourism and this is demonstrated through the Council's tourism strategy and the permissive local planning policies surrounding tourist development in the Local Development Plan.
- 12.13. At paragraph 1.4.31 of the LDP, the Council's culture and heritage strategy aims to "*support the improvement, expansion and diversification of appropriate sustainable tourism facilities and infrastructure in recognition of its importance to the economy and the need to balance development with environmental and cultural considerations.*" Accordingly, tourism policies TR1, TR3, TR6 take a positive stance on proposals for expansion or diversification of caravan and camping sites, subject to criteria.
- 12.14. There are numerous local businesses which are reliant on holiday parks such as Three Cliffs Bay. Within 2 miles of the application site are the following businesses:
 - Shepherds Shop and Cafe
 - Gower Heritage Centre
 - Parc le Breos Rooms and Restaurant
 - Perriswood archery Centre
 - Pennard Golf Club
 - Muddy Mail Room (coffee shop)
 - The Lookout Three Cliffs (cafe)
 - The Gower Inn
 - Nicholaston Farm Camping
 - Little Valley Bakery
 - Southgate Cub (pub)
 - Three Cliffs Bay Coffee shop

13. Planning Policy

- 13.1. Planning Policy Wales (Edition 10, December 2018) states that the Assembly Government's objectives are:

Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.

- 13.2. Paragraph 5.5.1 confirms that Tourism involves a wide range of activities, facilities and types of development throughout Wales and that states a *Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.*

- 13.3. Paragraph 5.5.2 continues by stating that “*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*”.

- 13.4. Paragraph 5.5.3 is also relevant to this planning application and provides the following advice:

“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.”

- 13.5. PPW is therefore very much ‘pro-tourism’ in terms of how it expects policies to be applied by Local Planning Authorities with an emphasis on sustainable forms of tourism development relating to the social, economic and environmental roles of sustainability. The planning application meets this national policy objective.

- 13.6. Consistent with the approach of PPW, TAN 13 (Tourism) confirms the importance of the tourism sector to the Welsh economy and under paragraph 4 states that Tourism “*makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas.*”

- 13.7. The advice in relation to holiday caravan sites is similarly positive with paragraph 12 stating that “*holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation whilst using less land for the purpose.*”

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- 13.8. The Development Plan for the area comprises the Swansea Local Development Plan Written Statement as adopted in February 2019.
- 13.9. In terms of any statutory or local designations on the land, the site is located within the Gower Area of Outstanding Natural Beauty (AONB).
- 13.10. The policies identified as applicable to development of this nature are as follows:
 - TR1 (Tourism, Recreation and Leisure Development)
 - TR 8 (Existing Static Caravan, Touring Caravan and/or Camping Sites)
 - TR 9 (Extensions to, and Overflow Areas of, Touring Caravan and/or Camping Sites)
 - ER 4 (Gower Area of Outstanding Natural Beauty)
 - CV 2 (Development in the Countryside)
 - PS 2 (Placemaking and Place Management)

TR 1 (Tourism, Recreation and Leisure Development)

- 13.11. Policy TR 1 is a strategic policy and relates to the overarching strategy for the local development plan. This policy provides support for sustainable development proposals which conserve natural heritage and will not have an adverse impact on features and areas of tourism interest, or result in an unjustified loss of tourism facilities or heritage assets. All proposals for new, or the extension of existing, tourism facilities or accommodation should be accompanied by a Tourism Needs and Development Impact Assessment which is produced within **Appendix 1**.
- 13.12. The relocation and redistribution of 54 tented camping pitches has significant benefits with regard to the holiday park's impact on landscape and visual impact within the AONB. These pitches are to be relocated to other sections of the site which are far better screened such as the land to the north of the bridleway and the touring caravan area. The area of land which will be relinquished will allow for a 'naturalised' area which will enhance the coastal character of the cliff edge. This therefore accords with the aim of TR 1 for tourism development in the countryside to not have any significant adverse impact on the landscape, natural environment or amenity.
- 13.13. With respect to the yurts, as highlighted above the applicant has sited these seasonal structures under the remit of the existing planning permission for tents in the northern field; the reason for this being that the yurts are portable structures constructed of canvas capable of being erected anywhere on site; they are not affixed to the ground or a particular location through any permanent means. The timber bases upon which they are disassembled and are taken off the land and stored away during the winter months.

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- 13.14. The yurt-style tents have allowed Three Cliffs Bay to enhance its accommodation offering, capitalising on the growth in popularity of 'glamping' holidays and helping to ensure the economic sustainability of the park. This again accords with policy TR 1 through improving the tourism facilities on offer within an existing park, as well as policy TR 8 which states at paragraph 2.11.54 of the subtext; "*Proposals to change tent or touring caravan pitches to, Yurt or Tepee pitches as part of a scheme of site improvement may be supported as they are seasonal in nature, are available for short-term let and increase the range and choice of accommodation on a site. The removal of bases during the winter months would be required*".

TR 8 (Existing Static Caravan, Touring Caravan and/or Camping Sites)

- 13.15. The development herein complies fully with the criteria within policy TR 8. It has been demonstrated above that there will be no harm to natural heritage and in fact will have improvements to the character of the area through the relinquishing of tented camping in a large part of the southern field which sits in an exposed location at the top of the cliffs. In this respect the development accords with points i and iii of TR 8. Furthermore, the creation of 200 metres of new hedgerows will ensure a strong physical boundary remains around the permitted area.
- 13.16. Furthermore, the development is sustainable and enhances the site through the clear environmental and economic benefits associated with relocating the camping pitches away from the coastal edge and through the provision of a wider range of holiday accommodation on site to strengthen the park's 5 star status. This accords with points ii and v of TR 8.
- 13.17. In terms of criterion vi) of TR 8, there will be a net reduction of site area by approximately 0.15 ha. Of the 75 tents which can be sited on the most visually prominent section of the park to the south of the bridleway, the applicant seeks to relocate 36 pitches to the northern element together with utilising an existing 19 hardstandings on the touring element for tents. This would leave just 20 tents occupying the most visually prominent area of the site.
- 13.18. Furthermore, the scale of the operation on site will remain the same as the applicant is simply relocating pitches. The yurt-style tents on site do not increase the permitted numbers as they are treated as being tented camping by the applicant and accordingly utilise 19 of the permitted pitches. There are, therefore, no potential detrimental impacts on traffic movements or additional pressures on infrastructure.
- 13.19. In terms of the extended season element of this application, it should be noted that the park presently operates from Good Friday or 1st April (whichever is earlier) to 31st October. The LPA have operated a policy for a considerable number of years of allowing small 5 pitch touring caravan sites with annual permissions and it is interesting to note that the season permitted by the LPA is 1st March to 1st November (inclusive) which would suggest this is the permissible season for this type of development.

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- 13.20. Policy TR 8 is permissive with regards to ancillary facilities which enhance and upgrade the site. The 2 water tanks and 2 gas tanks sited at Three Cliffs Bay are ancillary services to the camping and caravanning operation which all contribute to the high standard of pitch. The tanks are sited within 2 compounds, however to reduce the visual impact of the compounds the applicant has installed timber cladding on the external walls to create a more natural appearance and help them assimilate into the landscape.

TR 9 (Extensions to, and Overflow Areas of, Touring Caravan and/or Camping Sites)

- 13.21. Much of the reasoning above supports the development in the context of Policy TR 9 which relates to extensions to camping and caravanning sites. However, with reference to the criteria within, we would make the additional point that although there has been a change to the boundaries of the permitted areas within the holiday park, the actual site area of the park will be reduced with the approval of this application. Furthermore, there are significant landscape and visual benefits as a result of the development.
- 13.22. There is, therefore, no conflict with respect to the landscape's capacity to accommodate the development, and accordingly the development complies with Policy ER 4 relating to the protection of the AONB.

Policy ER 4 - Gower Area of Outstanding Natural Beauty

- 13.23. Three Cliffs Bay Holiday Park is located within the Gower Area of Outstanding Natural Beauty to which Policy ER 4 applies. In having regard to the development subject of this application, it is fully in accordance with this policy. It should be noted that the section of this report relating to Policy TR 8: Existing Static Caravan, Touring Caravan and/or Camping Sites, has made reference to the subject development in the AONB.
- 13.24. In terms of policy ER 4 and the stated criteria, criterion 1 confirms that development must not have significant adverse impact on the natural assets of the AONB. The proposed development is in accordance with this Policy in terms of a) the removal of tented camping pitches from the most visually prominent location on the site and returning the relinquished areas to wild; b) the planting of over 200 metres of new hedgerows; c) the timber decking is sited at ground level and is not visible particularly with a yurt-style tent sited thereon.
- 13.25. The second criterion to policy ER4 requires development to contribute to the social and economic wellbeing of the local community. The economic analysis produced within this application fully demonstrates the importance of tourism to rural area and, specifically, the importance of Three Cliffs Bay Holiday Park to the Gower and Swansea. The site is extremely popular and was voted the Best Holiday Park on the Gower in 2019. The park itself helps sustain a number of local businesses which are reliant on tourism.

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- 13.26. The applicant also proposes bicycle storage as part of this application which will encourage holidaymakers to be less reliant on the car whilst on site.
- 13.27. The proposed development is of a scale, form, design, density and intensity of use that is compatible with the character of the AONB. The application refers to a longstanding holiday park and the crux of the application is to extend one section of the site whilst relinquishing a more visually prominent section. Furthermore, the applicant seeks to remove 54 tents from the most visually prominent area of the park. In addition, the siting of 19 timber decks for the siting of yurt-style tents is compatible with the character of the site. The decking is not permanent and will be removed from the site during the closed season.
- 13.28. The proposed development will be designed to an appropriately high standard in order to integrate with the existing landscape. The applicant proposes over 200 metres of new hedgerows which will undoubtedly enhance the landscape quality and contribute to the conservation and enhancement of the natural beauty of the AONB.
- 13.29. In conjunction with Policy E4, the Gower Landscape Character Assessment (March 2013) has also been considered. The application site falls within Landscape Character Area (LCA) 16 Nicholaston and Penmaen which describes the area as:

A relatively narrow band of rolling lowland farmland, sandwiched between the break of slope along the coast above Oxwich Bay and the break of slope at the base of the rising common land of Cefn Bryn. It wraps around the eastern end of Cefn Bryn and runs north to meet the distinctive wooded valley at Parkmill, and east as far as the stream valley at Pennard Pill, with Pennard Burrows beyond.

- 13.30. The Management Guidelines in relation to holiday parks within LCA 16 states:

“Control caravan and camping site developments or extension in the northern section of the LCA so that intrusive visual effects are prevented, including light pollution”
- 13.31. LCA 16 also states that caravan and camping sites are a threat where they are conspicuous from public roads and higher ground viewpoints. However, the ‘opportunities’ section acknowledges the importance of hedge banks, especially where they form a boundary to caravan and camping sites.

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- 13.32. It should be noted that the application is fully compliant with LCA 16 insofar as the development seeks to improve any visual impact arising from the existing site by relinquishing the most visually prominent section of the site on land to the south of the bridleway. On the remaining land, the applicant proposes to relocate 54 pitches to better screened areas of the site. Any visual impact arising from the timber decking will be negligible given they are sited at ground level and will have a yurt-style tent sited thereon during the season. Between November and March, they will be removed completely from the site. The applicant also seeks to regularise a timber compound containing gas and water tanks for the amenity building on the southern element of the site.

Policy CV2 – Development in the Countryside

- 13.33. The proposed development is in accordance with this policy and its stated criteria. Whilst there is a presumption against development in the countryside, the policy lists exceptions which apply; one of which relates to ‘other rural enterprises’. Paragraph 2.10.12 to the subtext of policy CV2 confirms that tourism is a rural enterprise.

Policy PS2- Place Making and Place Management

- 13.34. Policy PS2- Place Making and Place Management is a detailed strategic policy in the LDP. In relation to the development, subject of this application, it should be noted that the proposal is in accordance with this policy.
- 13.35. In relation to policy PS2, there are 17 criterion which apply depending on the nature, scale and siting of the proposal. As noted, the subject development is in accordance with this strategic policy.
- 13.36. In terms of ‘sense of place’, this should be considered from the perspective of the visitor. In relation to such development, these are concerned with improving the holidaymaker’s experience on site. The applicant has spent a considerable sum of money on facilities on site to achieve 5 star status by Visit Wales, therefore there is a degree of customer expectation. Furthermore, with the advent of social media, negative experiences are transmitted on line and can drastically affect the business. The basis behind this application is to improve the outlook of the park from not just the visitor’s and site owner’s perspective but also the LPA, local residents and the Gower Society.
- 13.37. Much of policy PS2 refers to buildings. In terms of the timber decking, they are at ground level and will be removed from the site during the closed season. Therefore, they will have a very limited visual impact. The development subject to this application should be supported by the LPA in terms of providing visitors with a high standard of facilities on site to maintain the 5 star status of the park by Visit Wales. With such a positive experience of the site, holidaymakers are much more likely to return year on year and spend money in local pubs, restaurants and visitor attractions as well as further afield in Swansea and beyond.

14. Summary and Conclusion

- 14.1. The subject planning application is multi-faceted and addresses the following key areas:
- a) Regularise an extension to the northern element of the site;
 - b) Relinquish a commensurate area of the southern element of the site in exchange;
 - c) 19 timber bases measuring 6m x 5m between 1st March and 31st October and removed from the site during the closed season
 - d) Relocating 36 tent pitches from the southern camping field to the northern camping field (including 19 yurt-style tents);
 - e) Relocating 19 tent pitches from the southern camping field to the adjoining touring element;
 - f) A uniform 1st March to 31st October season across the whole park;
 - g) Bicycle Storage;
 - h) Regularise ancillary development; and
 - i) Proposed landscaping
- 14.2. This application provides Three Cliffs Bay Holiday Park with a more simplistic framework to operate. All previous planning permissions and Established Use Certificates could be relinquished as part of any such approval and replaced with an overarching planning permission. The Site Plan submitted with this application shows:
- a) The northern field will be used for the siting of 71 tents which includes 19 yurt-style tents and 19 timber decking bases between 1st March and 31st October and will be removed from the site between 1st November and the last day of February.
 - b) The southern field will be used for 23 touring caravans and motorhomes and 39 tents between 1st March and 31st October with no more than 20 tents being able to utilise the western element of this field which is the most visually prominent.
- 14.3. The applicant seeks a uniform 1st March to 31st October operating season across the entirety of the site. The majority of the site operates from Good Friday or 1st April (whichever is earlier) to 31st October.
- 14.4. The application seeks to regularise the ancillary development on the site which is located at the entrance to the northern camping field. This ancillary development relates to two water tanks and two gas tanks within a timber clad compound which is used to service the toilet block on the northern element. This ancillary development is, without doubt, necessary for the site to function. The applicant has already sought to screen the water and gas tanks with a timber compound and, as such, the applicant seeks to regularise this development.

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- 14.5. Finally, the applicant seeks consent for additional landscaping. This relates principally to the new hedgerow on the southern element of the site which will define the camping area and the areas the applicant proposes to relinquish as well as a new hedgerow to the north western boundary
- 14.6. Three Cliffs Bay Holiday Park, area from its permitted 23 touring caravans and 110 tents on site, creates approximately £940,000 in visitor expenditure into the local economy each year and sustains 17.4 FTE jobs in the local area. The approval of this application will help sustain and enhance visitor spend and local jobs.
- 14.7. The subject application is in accordance with both National and Local Planning Policy. The site is located within the Gower Area of Outstanding Natural Beauty therefore, the removal of 55 tented camping pitches from the most visually prominent area of the site should be supported. Whilst the applicant proposes to regularise an extension to the site amounting to 0.53 ha, he will be relinquishing 0.68 ha of land which is far more visually prominent. The application therefore proposes a decrease in the overall site area of Three Cliffs Bay Holiday Park.
- 14.8. We trust you find this application to be in order.

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