

# CADNANT

PLANNING

**Spring Gardens Holiday Park, The Roe,  
St. Asaph LL17 0HY**

**DESIGN, ACCESS AND PLANNING STATEMENT  
UPDATE**

Spring Gardens Holiday Park Ltd.  
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## Design, Access and Planning Statement



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# **1. Introduction**

- 1.1 This Design, Access and Planning Statement accompanies a draft planning application for the extension to existing caravan site and creation of 68 additional bases for static caravans, together with extension to private access road and upgrade of surface water and foul drainage system and associated landscaping and biodiversity enhancement. on land at Spring Gardens Holiday Park, St. Asaph.
- 1.2 This scheme will provide significant investment into the park and this proposed extension to the park will assist in further job creation; create additional tourism expenditure and ensure that the park becomes more resilient to flood risk in the long terms and also provides significant environmental benefits through connecting the park to the main foul sewer and also introducing extensive woodland planting and biodiversity enhancement.
- 1.3 This statement identifies the context of the site, sets out the proposal, discusses the relevant planning policy guidance and principle of the development, and assesses the main considerations which support the proposed development.
- 1.4 As required by the Town and Country Planning Development Management Procedure (Wales) (Amendment) Order 2016 this statement will address the following matters:
  - a) Explain the design principles and concepts that have been applied to the development;
  - b) Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
  - c) Explain the policy or approach adopted as to access, and how policies relating to access in the development plan have been taken into account; and,
  - d) Explain how any specific issues which might affect access to the development have been addressed.
- 1.5 This Design, Access and Planning Statement should be read in conjunction with the supporting plans, Landscape Proposals; Drainage Strategy and Ecological Survey.
- 1.6 The proposals have been prepared taking full account of The Well-being and Future Generations (Wales) Act 2015 and it is considered that the proposals are in accordance with the seven well-being goals and will constitute sustainable

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development in line with guidance set out in Planning Policy Wales (PPW) Ed.12, 2024.

- 1.7 The adopted development plan consists of the Denbighshire Local Development Plan (LDP) which was adopted in 2013.

## 2. The site and context

- 2.1 The site has long been identified as the Spring Gardens Holiday Park though it changed ownership some 15 years ago when Gwyn and Haf Williams acquired the park over 15 years ago when it was just a dilapidated touring park. Following the approval of planning permission they have turned it into a 72 pitch static caravan and holiday lodge park of some distinction. The Park has now passed to the next generation and further improvements are proposed to plan for future generations and allow for flood risk resilience and environmental improvements.
- 2.2 The site access is off the A525 though there is also a secondary access from Mount Road, which leads from St. Asaph. This access secondary, can be used as a means of escape during flood events but is not intended to be used as a vehicular access for customers or deliveries. Access from Mount Road will be restricted, with pedestrian and cycle access only permitted.
- 2.3 Caravan and mobile home parks are an existing and accepted part of the rural landscape in Wales and Denbighshire; provided that views of them are glimpsed and provided that they sit comfortably within their setting.
- 2.4 The application site is on land adjoining the existing site and, although being on higher ground than the existing site, and would form a reasonable extension to the existing park. The draft proposals have been informed by a landscape assessment and preliminary ecological appraisal.

### 3. The proposed development

- 3.1 The proposed development is for the extension to existing caravan site and creation of 68 additional bases for static caravans, together with extension to private access road and upgrade of surface water and foul drainage system and associated landscaping and biodiversity enhancement.

#### Design

*The design principles and concepts which have been employed are as follows:*

- Ensure that built development scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality;
- Ensure community safety and security in the design and layout of development and public / private spaces;
- Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality;
- Ensure convenient access to public transport facilities, and clear and well-defined links to pedestrian and cycle routes;
- Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development;
- Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats;
- Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area;
- Manage trees in a way that adds character to the site but also integrates the site to the wider area;
- The proposed development should be sited in such a way that it doesn't affect the amenities of surrounding properties or obstruct views / sunlight into other properties.
- The layout of the site should aim to accommodate the units in the most efficient way as to make the best use of the space on site;
- The proposed development should not have any impact on the character or historic value of the existing buildings;
- Noise pollution should be reduced through high quality design and materials in order to reduce effects on neighbouring properties.

## **Use**

- 3.2 In terms of use the caravan, which will comply with the definition of static caravans, they are intended to be used for holiday purposes only.

## **Scale**

- 3.3 The size and scale of caravans will be as set out in Section 13(2) of the Caravan Sites Act 1968. Following recent amendment to allow for improved energy efficiency and insulation the maximum size has been changed to:
- (i) length (exclusive of any drawbar); 20 meters;
  - (ii) width: 6.8 meters; and,
  - (iii) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 3.05 meters)

In this case, it is intended to site single until static caravans on the proposed pitches.

## **Layout**

- 3.4 The layout of the site provides for each lodge to have grasscrete parking spaces for cars, together with a raised deck area and also to far exceed the minimum separation distances required to comply with site license requirements. This is in line with the park's principles of achieving high quality and also maintaining a well landscape setting and allowing for further biodiversity enhancements. There are no specific parking standards relating to static caravans or lodges in the Council's Parking Standards. All roads have been designed to be kerbless to provide a rural appearance to the site. The site proposals allow for significant landscaping and allow the site to be broken up by on-site planting into groups of static caravan pitches broken up with extensive planting areas.

## **Appearance**

- 3.5 The overall appearance of the units are to consist of similar external appearance to existing lodges, finished in a pallet of environmental colours with effective use of glazing being made to ensure a sustainable form of development allowing maximum level of natural lighting into the caravans with overhanging eaves to avoid glare. The



colour of the caravans will be carefully chosen to tone in with the immediate environs and vegetation,

### Landscaping

- 3.6 An overall scheme of landscape mitigation and enhancement has been prepared to help integrate the caravans within the existing landscape while providing additional enhancement planting which will also provide ecological benefits through habitat creation. Ecological corridors will be created through the linking and reinforcement of hedges, the creation of SuDS ponds and a significant increase in woodland planting. This scheme of landscape planning will be managed as part of a comprehensive ongoing landscape management plan for Spring Gardens.
- 3.7 The caravan pitches would use the existing site's topography and gradient to make the terraces for the siting of units. Each plateau would contain clusters of lodges not exceeding 10 without landscape mitigation
- 3.8 Existing trees to the north west will provide natural screening of the caravans. These trees will also be further enhanced with additional planting, in particular on the bank between the existing site and the extended area and also along the north eastern boundary.

### Biodiversity

- 3.9 The accompanying ecological surveys confirm that there would be very little ecological impact by the proposed development. Overall the proposals are expected to have a minimal impact on the surrounding habitats and species when the proposed mitigation is implemented.

### Trees

- 3.10 No trees are to be lost as part of the development and significant woodland planting will be undertaken as part of the proposed works. The details of these measures are presented in the draft landscaping plans and show extensive areas of new woodland planting. It is considered that to provide woodland planting on the higher ground which forms part of the application site provides resilience in ensuring that these environmental improvements are not subject to damage by flood events in future.

## **Environmental sustainability**

- 3.11 The scheme will seek to implement environmentally sustainable features where possible; this includes the use of sustainable materials, energy saving lightbulbs and other features where possible.
- 3.12 The caravans will make good use of glazing which will provide a good level of natural light as well as help heat the units.
- 3.13 The site is also accessible via public transport with bus stops available and accessible to pedestrians close to the site entrance on the A525 and close to a public footpath network linking the site to St. Asaph reducing the reliability on private vehicles for end users of the development; this will in turn contribute to reducing carbon emissions.

## **Movement to, from and within the site**

- 3.14 The internal road layout of the site has been designed to allow unrestrictive movement to, from and within the development. All routes within the site are safe shared routes for pedestrians and vehicles with wide carriageways and low site speed limits.
- 3.15 There is capacity at the existing access onto the A525 to serve this proposed development.
- 3.16 Turning and movement space will be incorporated into the design to allow a permeable internal road layout.
- 3.17 The layout will allow all users to access the site and the internal paths and circulation space will be accessible for all.

## **Character**

- 3.18 The proposed new pitches and caravan units have been designed in a way which is sympathetic of the surrounding area, having been informed by a landscape assessment.
- 3.19 The layout, design and appearance of the scheme reflects a less dense form than the existing site with caravan pitches are clustered in groups within enclosed woodland areas.

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- 3.20 The design, layout and scale will integrate well with the existing landscape. All areas are screened by existing or proposed trees and hedgerows. Distant views into the site are already obscured from most directions by the existing trees and topography and significant additional landscaping is proposed along the more open areas of the site, in particular on the boundary with Mount Road and on the bank between the current site and the extended area.
- 3.21 The proposal seeks to retain existing vegetation, trees and grass verges, while implementing a landscaping scheme which adds to the existing landscaping features. Shrub, hedgerow, woodland and tree planting will be incorporated on the site to add to the rural character of the proposal.

## Community safety

- 3.22 The design of the proposal has taken into consideration the safety of the end users. It is considered the proposal will not have a detrimental impact on community safety. The design of the holiday units seeks to implement natural surveillance via orientation and thus increase safety. The proposal will enhance public safety through the control of the use of the existing Mount Road vehicular access, encouraging its use only by pedestrians and cyclists.

## Access

- 3.23 The caravan park is served by an existing access off the A525. It is a major road and connects the site to St. Asaph, Rhuddlan and Rhyl. It is also close to the A55 for tourist traffic.
- 3.24 There is capacity on the existing access to serve the proposed development without required visibility improvements. The site owners are separately looking at the feasibility of re-introducing a right hand turn into the site from the A525, though those proposals do not form part of this application.
- 3.25 The application site is located within close proximity to the A55 expressway which provides a link to the sub-regional centres of Llandudno and Bangor as well as more distant centres and cities including Wrexham and Chester.
- 3.26 There is a bus stop close to the site entrance. The application site is accessible by all means of transport including by private transport, on foot and by use of public

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transport. The bus stop is served by the services 52 and 54 which link to St. Asaph; Denbigh and Rhyl, providing a link to the mainline train services at Rhyl.

- 3.27 In addition, there are Public Rights of Way that border the application site, providing direct links onto the wider network of footpaths.
- 3.28 Whilst the application site lies within a countryside location it is also in close proximity to local attractions, in particular the historic and commercial centre of St. Asaph. The caravan site owners and site management actively market local attractions to their visitors. Many of these attractions can be reached using public transport.
- 3.29 It is therefore considered that the site and the proposed development will be accessible to its future occupiers without having to rely on the private car.

## 5. Policy context

- 5.1 Relevant national planning policy guidance is set out in Planning Policy Wales (PPW) (Edition 1), 20 and Technical Advice Notes (TAN), with local planning policy set out in the adopted Denbighshire Local Development Plan (2013) and relevant guidance in Supplementary Planning Guidance.

**Table 5.1 Summary of relevant planning policy and guidance**

Policy	Summary of policy
PPW Tourism	<p>PPW identifies that '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.'</p> <p>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.</p> <p>PPW acknowledges that in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy and it should be sympathetic in nature and scale to the local environment.</p> <p>Welsh Government advises that planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity.</p> <p>Section 5.5 of PPW guides on tourism development. Paragraph 5.5.6 states that; <i>'Planning authorities should provide a framework for maintaining and developing well-located, well designed, good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation and access to be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity'</i></p> <p>This sets out a framework for high quality tourism accommodation.</p>
PPW The economy	<p>One of the key planning principles in PPW is that the planning systems should enable development which contributes to long term economic well-being. One of the themes in PPW is 'productive and enterprising places' and one of the key issues identified in that theme is to promote and diversify the rural economy to ensure it is fit for the future and economically sustainable while ensuring that unnecessary development in the countryside is controlled.</p> <p>Section 5.6 of PPW acknowledges that a <i>'strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new</i></p>

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	<p><i>enterprises and the expansion of existing business is crucial to the growth and stability of rural areas’.</i></p> <p><i>For planning purposes the Welsh Government defines economic development as ‘the development of land and buildings for activities that generate sustainable long term prosperity, jobs and incomes’.</i></p> <p>Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services.</p> <p>This endorses the importance of tourism as a basis for the rural economy and provision for high quality tourism ventures such as the proposals at Spring Gardens Holiday Park should be considered favourably.</p> <p>Paragraph 5.9.20 of PPW advises that the social, environmental and economic (including job creation) benefits associated with any development should be fully factored into, and given weight in the decision making process.</p> <p>When assessing sustainable benefits of development, PPW advises that there may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.</p>
PPW Assessing the Sustainable Benefits of Development	<p>Paragraph 2.26 advises that;  <i>“Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.”</i></p> <p>Paragraph 2.22 goes on to advise that the key factors in an assessment relate to social considerations, economic considerations, cultural considerations and environmental considerations.</p>
PPW Access	<p>Paragraph 3.50 states that;  <i>“A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor’s surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.”</i></p> <p>Paragraph 3.6 advises that;  <i>“Development proposals must address the issues of inclusivity and accessibility for all. This includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children. There will often be wider benefits to be gained through the</i></p>

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	<i>sensitive consideration of such provision, for example, whilst the presence of visual cues will be invaluable in assisting those with hearing loss to engage in a noisy environment, a navigable environment will benefit all. Good design can also encourage people to meet and interact with each other, helping to address issues surrounding loneliness. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.”</i>
PPW Amenity	Paragraph 3.21 states that; <i>“The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity.”</i>
PPW Design	Section 3 relates to design and Placemaking In Action. It considers that Good Design Making Better Places. Paragraph 3.3 advises that; <i>“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area.”</i>  Paragraph 3.4 goes on to state that; <i>“Design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future. For those proposing new development, early engagement can help to secure public acceptance of new development. Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales. These objectives can be categorised into five key aspects of good design”.</i>
PPW Biodiversity	In terms of biodiversity, paragraph 6.4.1 of PPW advises that biodiversity underpins the structure and functioning of ecosystems. Paragraph 6.4.3 goes on to advise that the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Proposals should support the conservation of biodiversity, in particular the conservation of wildlife and habitats.  The proposed development has been informed by a Preliminary Ecological Assessment which includes details of proposed biodiversity enhancement measures ensuring that the scheme has taken account of biodiversity interest as part of the design process.
TAN 6 Planning for Sustainable Rural Communities	TAN 6 gives advice on sustainable forms of development within rural Wales and paragraph 2.1.1 states:  <i>‘The planning system has a key role to play in supporting the delivery of sustainable rural communities. It can help to ensure that appropriate development takes place in the right place at the right time by making sufficient</i>

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	<p><i>land available to provide homes and employment opportunities for local people, helping to sustain rural services.'</i></p> <p>Paragraph 3.1.1 of TAN 6 advises that:  <i>'Strong rural economies are essential to support sustainable and vibrant rural communities. A strong rural economy can also help to promote social inclusion and provide the financial resources necessary to support local services and maintain attractive and diverse natural environments and landscapes'.</i></p> <p>The advice note then goes on to say that planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment.</p>
TAN 12 Design	<p>The guidance in TAN 12 has been considered in formulating the proposal and in reporting on the Design and Access issues. The Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion, at every scale throughout Wales. Paragraph 5.5.1 of TAN 12 identifies that an understanding of landscape and townscape quality, including its historic character, is fundamental to the design process.</p> <p>The relationship between all elements of the natural and built environment. To create sustainable development, design must go beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings.</p> <p>Good design is also inclusive design. The principles of inclusive design are that it places people at the heart of the design process, acknowledges diversity and difference, offers choice where a single design solution cannot accommodate all users, provides for flexibility in use, and, provides buildings and environments that are convenient and enjoyable to use for everyone.</p>
TAN 13 Tourism	<p>TAN provides guidance on tourism related issues in planning including matters relating to hotel development, holiday and touring caravans and seasonal and holiday occupancy conditions.</p> <p>The TAN recognises that holiday accommodation development can bring benefits for the local community to support amenities and activities for residents and tourists.</p> <p>Paragraph 4 identifies 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. It is subject to change in the type of holiday taken and the length of the holiday season.</p> <p>Technical Advice Note 13 supplements Planning Policy Wales and provides guidance on tourism development. Paragraph 4 identifies 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</p>



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	<p>communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season.</p> <p>TAN 13 advises that; <i>'In preparing development plans, local planning authorities should investigate the adequacy of facilities for both the static and touring caravanser and reconcile these needs with the protection of the environment. 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, while using less land for the purpose. Holiday caravan sites can be intrusive in the landscape, particularly on the coast. Special consideration needs to be given to proposals for new sites, especially in National Parks, Areas of Outstanding Natural Beauty, Heritage Coast and sites of national and international importance designated for their natural features'</i>.</p> <p>Tourism facilities should be provided in both rural and urban areas and should be sensitive to the needs of users, attractive, well designed, well maintained, protected from crime and vandalism, safe and accessible by people whose mobility is restricted and by a variety of sustainable means of travel, particularly walking, cycling and public transport.</p>
TAN 18 Transport	<p>TAN 18 has also been taken into consideration. The main aim of TAN 18 is ensuring that new development is located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion.</p> <p>Paragraph 2.4 of TAN identifies that the inter-relationship between land use planning and transport is complex and varied. The development of land is dependant, in part, upon transport infrastructure and services to function efficiently. By influencing the location, scale, density and mix of land uses and new development, land use planning can help reduce the need to travel and length of journeys, whilst making it easier for people to walk, cycle or use public transport.</p> <p>TAN 18 also considers people with disabilities. TAN 18 identifies that it is important to consider their needs in terms of parking, in particular ensuring that adequate numbers of suitably designed parking spaces are provided in appropriate locations.</p>
TAN 23 Economic Development	<p>Technical Advice Note 23 'Economic Development' (February 2014) sets out advice on economic development considerations of developments. Section 3 of the Note discusses 'Economic Development and the Rural Economy'. Paragraph 3.1.1 states that; 'A wide range of economic activities may be sustainably accommodated in rural areas, and this is recognised in PPW and other TANs, in particular TAN 6 Planning for Sustainable Rural Communities.'</p> <p>TAN 23 reiterates the importance of economic development and the rural economy, stating that 'Sustainable development is essential to building strong rural economies and vibrant communities.'</p> <p>TAN 23 goes on to state that in rural areas local planning authorities should use a sequential approach when identifying land for economic uses in development plans. Less preferable locations may also be appropriate where the resulting benefits outweigh any adverse impacts of the development. In judging these</p>

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	<p>benefits, authorities should have regard to considerations such as jobs accommodated, alternatives, and special merit.</p> <p>As the proposal in this case is for an extension to the existing tourism business, it follows that the site for the proposal must be in the rural location where the existing business is already established. The business should be supported in expanding, and this proposal can help to secure improvements to the business but also help mitigate existing visual impact caused by the site whilst improving the quality of the tourism offer.</p> <p>Finally, the guidance makes it clear that the expansion of existing businesses located in the open countryside should be supported provided there are no unacceptable impacts on local amenity. This submission demonstrates that there are no unacceptable impacts on local amenity arising from the proposal for an extension to the existing caravan park.</p>
TAN 24 The Historic Environment 2017	<p>TAN 24 provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning. The TAN provides guidance on how the following aspects of the historic environment should be considered:</p> <ul style="list-style-type: none"> <li>• World Heritage Sites</li> <li>• scheduled monuments</li> <li>• archaeological remains</li> <li>• listed buildings</li> <li>• conservation areas</li> <li>• historic parks and gardens</li> <li>• historic landscapes</li> <li>• historic assets of special local interest.</li> </ul>

### Denbighshire Local Development Plan

LDP Policy PSE 5 Rural Economy	<p><i>'In order to help to sustain the rural economy, tourism and commercial development, including agricultural diversification, will be supported throughout the County subject to detailed criteria, which include making a significant contribution to sustainable development and recognising the special status of the Area of Outstanding Natural Beauty/Area of Outstanding Beauty.</i></p> <p><i>Appropriate employment proposals for both conversions and new build outside of development boundaries will be supported provided the following criteria are met:</i></p> <p><i>i) the proposal is appropriate in scale and nature to its location; and</i></p> <p><i>ii) any suitable existing buildings are converted or re-used in preference to new build; and</i></p> <p><i>iii) proposals for new buildings are supported by an appropriate business case which demonstrates that it will support the local economy to help sustain local rural communities; and</i></p> <p><i>iv) within the AONB/AOB, Pontcysyllte Aqueduct and Canal World Heritage Site (including the buffer zone) or other regionally important landscape areas, take full account of and seek to enhance the nature and distinctive qualities of the local landscape. In line with national policy any proposals that are considered to be detrimental to the quality of the AONB and World Heritage Site will be refused.'</i></p>
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<p>LDP PSE 12 chalet, static and touring caravan and camping sites</p>	<p>Proposals for new static caravan sites will not be permitted. However the environmental improvement of existing static holiday caravan or chalet sites by remodelling, provision of new facilities and by landscaping will be supported provided the development is acceptable in terms of other Local Development Plan policies and meets the following criteria:</p> <ul style="list-style-type: none"> <li>i) the proposed development preserves or enhances the character and appearance of the area; and</li> <li>ii) it can be demonstrated that any proposed increase in the number of static caravan/chalet units would preserve or enhance the landscape setting of the overall site.</li> </ul> <p>The change of use of a static caravan or chalet from tourist use to residential use and the conversion of touring caravan sites to statics will not be permitted.'</p>
<p>SPG Caravans, Chalets and Camping (2018)</p>	<p>The Adopted SPG provides guidance on extensions to existing caravan sites and advises that suburban type layouts will not be acceptable in rural locations. Within rural locations the site layout should be open plan, with no formally defined curtilage between units. Instead of formal curtilages, a high quality and integrated landscaping scheme for the entire site shall be encouraged. Informal open areas for informal recreation should be included as part of the site layout. As part of the overall landscaping and layout of large sites, the site should be broken up into smaller clusters.</p> <p>In terms of Landscape proposals the SPG advises that proposals will be required to demonstrate how the development would be integrated within its setting, and conserves and enhances existing landscape features. They should be developed in response to the landscape and visual analysis of the site and in conjunction with planning and design of the development as part of an integrated proposal. All planning applications must be accompanied by a comprehensive landscaping scheme, including proposals for management and aftercare of the site.</p> <p>Proposals should have regard to the following:</p> <ul style="list-style-type: none"> <li>• Set out any changes to landform, the use of retaining structures and how these will be naturalised – generally only very minor reshaping of hillside sites should be considered due to the difficulties in naturalising bare ground, steep slopes and thin soils;</li> <li>• The use of native indigenous plant species are required to maintain rural character and support biodiversity. Scots pine, Corsican pine, Yew and Holly, may be appropriate for adding some evergreen cover into the planting mix. Fast growing conifers will not be acceptable;</li> <li>• Planting, protection, establishment and maintenance specification for new planting will be required;</li> <li>• New boundaries should have regard to the local vernacular traditions e.g. hedgerows, dry stone walls etc;</li> <li>• Finishes to hard landscape components will be specified including roads, paths and retaining structures;</li> <li>• The use of natural materials and colour hues can help integrate buildings within rural settings;</li> <li>• A management plan for existing hedgerows, trees and woodland within the ownership of the applicant would be required where these are important to the character and integration of the development (normally 25 years or for the lifetime of the development);</li> </ul>

## 6. Main considerations

### Principle of development

- 6.1 Denbighshire LDP policy PSE 12 for chalet, static and touring caravan and camping sites is the relevant policy, in line with other relevant policies which are detailed in the design process. PSE12 supports the environmental improvement of existing static holiday caravan sites by remodelling, provision of new facilities and by landscaping provided the development is acceptable in terms of other Local Development Plan policies and meets the following criteria:
- the proposed development preserves or enhances the character and appearance of the area; and
  - it can be demonstrated that any proposed increase in the number of static caravan/chalet units would preserve or enhance the landscape setting of the overall site.
- 6.2 The proposed development has been assessed to consider the compliance with Policy PSE 12 and in line with National Planning Policy which emphasises the need to encourage and, where possible, safeguard the tourism sector, and exploit tourism potential, especially relating to the natural and built environment, in order to encourage all year-round tourism.
- 6.3 These proposals form an extension to an existing caravan park. The Spring Gardens Holiday Park site is managed to the highest quality. The proposals would be carried out using the same design principles as that of the existing park but at a lower density and further to this, a significant landscaping and woodland planting and management scheme also incorporates numerous biodiversity enhancements across the site as a whole.
- 6.4 The scheme would not result in an unacceptable concentration of sites or pitches at any one locality or area.
- 6.5 Permitting the proposed development at Spring Gardens Holiday Park will contribute positively to the park and its functionality in providing a tourism role within this area of

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Denbighshire and will deliver the sort of tourism activity that allows and encourages high customer spend in the local economy but in a sustainable manner.

- 6.6 Investment into the park is set to continue beyond the siting of these additional caravans. It is intended to upgrade the drainage system at the Park, connecting the whole site to the main foul sewer network in lieu of existing septic/treatment plants and also to implement a sustainable surface water management system throughout.
- 6.7 The proposals will help support the on-site facilities and the proposal would offer great economic benefits including further job creation and support of other local businesses and suppliers. In addition, could better sustain the existing jobs on site better throughout the year.
- 6.8 This proposal, would increase the use of the site, and support the objectives of the Denbighshire LDP, The Future Wales: the National plan 2040 (2021), and help deliver the aims of The Welcome to Wales priorities for the visitor economy 2020 to 2025 (2020) Strategy. The proposal also helps deliver some of the key aims of the Denbighshire Destination Management Plan which aims to protect and support the existing tourism infrastructure and accommodation base as well as opportunities for future tourism development.
- 6.9 Caravan holiday accommodation can contribute to spin-off spending within the local economy such as in local pubs, local restaurants, visiting other tourist attractions, local towns and villages, local beaches, castles and historic houses.
- 6.10 The foregoing provides a clear endorsement of the proposal for improvements to the quality of site from an economic perspective and in line with the advice in PPW that greater weight should be attributed to the economic benefits of development, in particular tourism development, the proposal should be supported from a national planning policy perspective.
- 6.11 The above re-affirms that the proposed development will successfully contribute towards increased local spend by visitors within the local economy and will support existing and future businesses in the area. This is particularly pertinent in this case as the location of the proposed development is considered to be attractive and accessible to visitors. Spring Gardens as a business provides information at the main reception area and on their web page pointing holidaymakers towards local facilities.

- 6.12 In addition to the additional spend by tourists it is important to note the contribution local businesses such as Spring Gardens make towards the local economy throughout the year. This includes spending with local businesses for fuel, maintenance equipment, landscape and electrical contractors.

### Economic benefits

- 6.13 The Wales National Plan confirms that foundational economic activities remain the backbone of the rural economy. In particular, tourism and leisure is recognised as a major and growing employer and contributor to the Welsh rural economy. Permitting the proposed extension to Spring Gardens would contribute positively to the caravan park and its functionality in providing a tourism role within this rural area of Denbighshire and will deliver the sort of tourism activity that allows and encourages high customer spend in the local economy but in a sustainable manner.
- 6.14 The proposed scheme, through the delivery of high-quality tourist accommodation would deliver economic benefits to the local area, which would contribute to significant additional spend within the local economy. In addition, in this case it would also lead to job creation at the site.
- 6.15 Tourism significantly contributes to the economy of Wales. Between September 2018 and 2019, there were 10.4 million overnight trips to Wales, an increase of 6.3% compared to the previous 12 months. The expenditure at £1,973 million was also up by 9.2%. These increases are higher than those for Britain as a whole with trip volumes only increasing by 0.1%.
- 6.16 For both Wales and GB as a whole the number of visits and total expenditure increased but the number of nights fell - indicating that visitors take shorter overnight stays but spend more while they are there.
- 6.17 In 2017, results from the GB Tourist Survey show that British holidaymakers staying on holiday parks during their domestic holidays spent a total of £2.11 billion – 14.9% of all spending during domestic holidays in Britain – and account for almost a third (29%) of all holiday nights.
- 6.18 Out of 59.1 million domestic holiday trips in 2017 in Great Britain, 13.7 million trips relate to the parks industry. This makes up just under a quarter (23.2%) of the GB total.

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- 6.19 In 2017, spending during domestic holidays which involved staying in a privately-owned static caravan was £271 million, which represents 1.9% of the GB total.
- 6.20 Over a quarter (29.2%) of all domestic holiday nights are spent on parks in Britain. This figure is made up of 8.2% of the GB total in caravan holiday homes to let, 5.2% in privately-owned caravans, 8.9% in touring caravans and 7% in tent/glamping.
- 6.21 The importance of tourism and, in particular, self-contained high quality holiday accommodation on well managed sites is a key part of the economic recovery post Covid 19 Pandemic.
- 6.22 Welsh Government Chief Executives and Head of Planning letter dated 20th July 2020 stated that;
- 6.23 *'Caravan parks and self-catering accommodation are important to the Welsh economy but it has a pronounced seasonal peak in July and August, particularly for caravan parks. While there is a risk this spending may be lost to the industry, the latest consumer survey (29 June -3 July) shows that 25% of UK adults intend to go on a UK short break or holiday by September, while 35% plan on taking their next trip in October or later. The industry has identified a need to boost income and encourage recovery by supporting an extension of the season for caravan parks and self-catering accommodation which are prevented from opening all year.'*
- 6.24 Although this does not refer to the extension of sites, it does show that there is going to be a high demand on UK holidays. It is therefore considered that this development would help meet the future demand for such units.
- 6.25 In addition, the Welsh Government 'Building Better Places, The Planning System Delivering Resilient and Brighter Future – Placemaking and the Covid-19 Recovery', July 2020, places further emphasis on growing Wales' economy in a sustainable manner and specifically as one of the 8 key issues to action 'Reawakening Wales' tourism and cultural sectors'. This section of the guidance (P21) states that;
- 'The planning system strongly supports a diverse, sustainable tourism and culture industry. It brings jobs and income into Wales and it enables people worldwide to enjoy and experience Welsh hospitality, landscape and culture. We want this sector to resume and recover as soon as it is safe to do so and we support appropriate efforts to build quality and diversity into the visitor and cultural economy. It is particularly important that tourism and culture opportunities that can deliver community benefits*



*to the local area are supported in coastal and rural areas. Tourism and cultural developments may offer a positive way of reusing empty buildings, historic buildings or disused land as part of regeneration schemes.'*

6.26 This section goes on to state that;

*'PPW sets out the positive framework for tourism and culture that encourages the sector to enhance the sense of place in tourist hotspots and to develop new opportunities and cultural experiences in new destinations. The importance of tourism to coastal towns, and its potential role in regeneration projects, is also recognised.'*

6.27 Tourism is clearly a significant part of Welsh Governments plan for post Covid 19 Recovery. These units would expand the offer on an existing site and can be easily and quickly developed to provide additional accommodation in an excellent location which benefits the local economy through additional support to the local businesses and cultural facilities in the area.

### Holiday parks in Wales

6.28 A 2019 report for the UK Caravan and Camping Alliance, 'Pitching the value, 2019 Economic benefits Report: Holiday Parks and Campsites, Wales' provides an independent, evidence-based, understanding of the direct and indirect economic impact/contribution of the holiday park/campsite sector in Wales.

6.29 It is estimated that in 2018 visitors to Welsh holiday parks/campsites spent a total of £1.33bn in the Welsh economy, made up as follows:

- £540.2m on-site spend;
- £366.3m off-site spend; and
- £426m of multiplier impacts.

6.30 Caravan holiday accommodation can contribute to spin-off spending within the local economy such as in local pubs, local restaurants, visiting other tourist attractions, local towns and villages, local beaches, castles and historic houses.

6.31 This visitor expenditure supports 24,677 FTE jobs and contributes £761.4m of GVA to the Welsh economy. North Wales recorded one of the highest visitor impacts with visitor expenditure of £865.1million, equivalent to a GVA impact of £494.3 million and to 16,020 supported FTE jobs.



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- 6.32 The accommodation type which recorded the highest net visitor impact were owner-occupied caravan holiday homes; with visitor expenditure of £757.0m, equivalent to a GVA impact of £432.5m, and to 14,018 supported FTE jobs.
- 6.33 The above statistics re-affirm that the proposed development, at this very high quality holiday park, would provide an extraordinary quality development and will successfully contribute towards attainment of increased local spend by visitors within the local economy and will support existing and future businesses in the area. This is particularly so in this case as the location of the proposed development is considered to be attractive and accessible to visitors in close proximity to the historic town of Conwy.
- 6.34 In addition to the spend by tourists, it is important to note the contribution local businesses such the year. This includes spending with local businesses for fuel, maintenance equipment, landscape and electrical contractors.
- 6.35 In addition to the figures above, money spent on maintenance by tourers and caravan holiday homeowners adds a further £127.1m of expenditure to the Welsh economy.

## Economic Benefit Report 2024

- 6.36 A new 2024 'Pitching the Value' report has been released by the UK Caravan and Camping Alliance (UKCCA) highlighting the economic value and wellbeing impact of the UK holiday parks and campsites sector and its important contribution to UK domestic tourism.
- 6.37 Despite the challenges businesses have faced in the past few years such as Brexit, the Covid pandemic and more recently the cost-of-living crisis, the latest UKCCA report demonstrates the holiday park and campsite sector is resilient and continues to make a significant contribution to the UK economy.
- 6.38 Statistics from the 'Pitching the Value' economic benefit report 2024 record that the sector:
- generates £12.2bn in visitor expenditure equating to £7.2bn Gross Value Added (GVA) to the UK economy
  - supports 226,745 full time jobs across the UK
  - attracts a touring visitor and holiday caravan owner average spend of just over £100 per day (on-site and off-site)

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- welcomes visitors to UK holiday parks and campsites who stay 82% longer and spend 12% more than the national tourism average

## 7. Conclusion

- 7.1 The proposed extension to Spring Gardens Holiday Park represents a carefully considered and sustainable form of tourism development that will deliver clear economic, environmental and social benefits for Denbighshire. The scheme has been designed to integrate sensitively with the surrounding landscape, employing high-quality materials, clustered layouts, extensive landscaping, and biodiversity enhancements that will both preserve and improve the character of the area.
- 7.2 By expanding an established, well-managed holiday park, the proposal supports the aims of national and local planning policy, particularly in strengthening the rural economy, enhancing tourism infrastructure, and promoting year-round economic activity. The development will generate direct and indirect employment, increase local visitor spend, and contribute positively to the resilience of the local tourism sector, while also delivering substantial environmental improvements through sustainable drainage solutions, woodland planting, and ecological corridor creation.
- 7.3 The application demonstrates full compliance with relevant planning policies, including Denbighshire LDP Policy PSE 12, and aligns with the Welsh Government's ambitions for sustainable tourism, rural economic diversification, and climate resilience. There will be no unacceptable impacts on local amenity, highway safety, or the natural environment, and the site will remain accessible by a choice of sustainable transport modes.
- 7.4 In summary, this is a well-designed, policy-compliant proposal that will secure significant long-term benefits for the park, the local economy, and the wider community, and it is therefore respectfully commended for approval.

# CADNANT

PLANNING

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