



## **PLANNING STATEMENT (For PAC Purposes)**

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In support of:-

**THE SITING OF 86 NO. TOURING CARAVANS  
FOR HOLIDAY ACCOMMODATION PURPOSES  
AT  
GATEWAY RESORT, BYNEA, LLANELLI,  
CARMARTHENSHIRE, SA14 9SN**

On behalf of:

**Mr. K. Strelley**

Ref: 2003.f

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June 2021

**JCR Planning Ltd.**

**PLANNING • DEVELOPMENT**

**Advising the property and  
development industry**

Units 2 & 3 Cross Hands Business Workshops, Heol Parc Mawr,  
Cross Hands, Carmarthenshire, SA14 6RE  
Email: [info@jcrplanning.com](mailto:info@jcrplanning.com)  
Tel: 01269 267160  
Web: [www.jcrplanning.com](http://www.jcrplanning.com)

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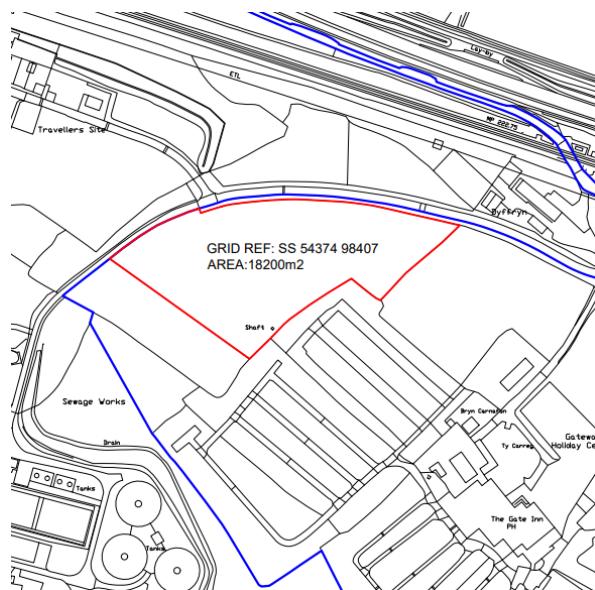
# **THE SITING OF 86 NO. TOURING CARAVANS FOR HOLIDAY ACCOMMODATION PURPOSES AT GATEWAY RESORT, BYNEA, LLANELLI, CARMARTHENSHIRE, SA14 9SN**

## **1.0 INTRODUCTION**

- 1.0.1 JCR Planning Ltd. has been instructed by Mr. K. Strelley ('the Applicant') to assist with the preparation and submission of a full planning application for the siting of 86 no. touring caravans for holiday accommodation purposes at Gateway Resort, Bynea, Llanelli, SA14 9SN.
- 1.0.2 This Planning Statement forms part of the application submission to be considered by the Local Planning Authority in conjunction with drawing no. LOCBL/2003f/01b.
- 1.0.3 The award winning 'Gateway Resort', situated adjacent to the Loughor Estuary, is a valuable commercial enterprise, bringing investment and significant employment opportunities to Carmarthenshire.
- 1.0.4 The resort's purpose is to create an iconic, high quality, all-encompassing Welsh tourism destination, that will be synonymous with enjoyment for all visitors.
- 1.0.5 This statement provides information in respect of the following:-
- a brief description of the site and surrounding area
  - a description of the proposed development
  - consideration of relevant planning policy
- 1.0.6 The exact content of this application aims to provide the required level of information to satisfy the Pre-Application Consultation (PAC) procedure. It is envisaged that details of this proposal may be altered/amended in light of any pertinent comments that are received during the PAC consultation process.

## 2.0 THE SITE

- 2.0.1 The Gateway Resort is located in South West Wales, approximately 10 kilometres (6 miles) north-west of Swansea, to the west of the River Loughor and south of the settlement of Bynea.
- 2.0.2 It is positioned between the main Swansea-Llanelli railway line to the north and the Loughor estuary, with the Millennium Coastal Path to the south.
- 2.0.3 The site is approximately 1 kilometre (0.6 miles) south-west of the Berwick roundabout on the A484 Swansea to Llanelli relief road. It is presently accessed from the Berwick to Morfa link road and shares the same road access as the Welsh Water sewerage treatment plant, Dyffryn Farm, and the Penybrynn Residential Travellers' site.
- 2.0.4 To the west of the treatment works is Penclacwydd Wildfowl & Wetlands Centre, which is trust administered and is situated to the west of Gateway Resort.
- 2.0.5 The site comprised a former agricultural holding, with both farmyard and grazing fields, prior to being developed for leisure, camping and caravan purposes.



*Fig. 1 – Location of ‘Springboks’ field in relation to Gateway Resort complex*

- 2.0.6 Gateway Resort is equipped with a multi-purpose clubhouse, accommodating bar and restaurant facilities, together with a site shop, reception area, hairdressing salon,

indoor swimming pool, children's play provision and extensive amenity areas, including a fishing and amenity lake, crazy golf course and surfaced car parking areas. More recent schemes being developed include an E-kart race track, a multi-purpose recreation building (Bob's Barn), bespoke hotel accommodation, etc.

- 2.0.7 The landscape within this part of Bynea is known for the wide expanse of coastal and lowland levels, which spread north of the Burry Estuary towards the built-up areas of Bynea and Llwynhendy. The land is mainly given over to large, generally level grazing fields, separated by high hedgerows. It is bounded by mature hedgerows and an access track. Access into the Springboks field is through a permanent opening which links to the main car park.
- 2.0.8 The Gateway Resort extends to approximately 38 hectares and is largely laid to pasture. In order to maintain the site, the Applicant allows appropriate numbers of livestock (sheep) to graze. This is supplemented by a programme of seasonal grass mowing, involving various grass cutting machines, as well as grass mower toppers pulled by tractors.



*Fig. 2 – Aerial image of 'application site'*

- 2.0.9 It is an area with an established tourism use bringing investment into the local economy. In order to maximise its role as a key tourist destination, both facilities and accommodation have to continually develop and improve.
- 2.0.10 The actual area chosen for the siting of the new 86 touring units is described for marketing purposes as the 'Springboks field'. It is situated at the northern edge of the

Gateway site. It is an area of relatively flat grassland, with no physical features of note, and measures a little over 1.6ha. The Springboks field is of irregular shape and is bounded to the north by a relatively quiet access road. The site's other boundaries are formed by additional defined areas within the Gateway complex.

## 3.0 THE PROPOSED DEVELOPMENT

- 3.0.1 The Gateway Resort has been conveniently divided into a number of sub-areas reflecting the names of sports teams – i.e. Scarlets, Blues, Swans, etc. Each of these fields is used for holiday caravans and differ from each other only in terms of layout and density. Planning permission for the siting of touring caravans within the Gateway Resort has been granted over the years as part of the site's development.
- 3.0.2 Since the time of inception of the Gateway Resort, the Springboks field has been regularly used for amenity purposes and has been maintained by livestock grazing. Occupiers and holidaymakers regularly travel from a long distance in order to take advantage of and enjoy the full range of facilities available at Gateway Resort, and the yearly demand for additional accommodation is increasing at an impressive rate.
- 3.0.3 The proposed Springboks field site layout for the touring caravans will resemble a formal pattern. The pitches have been set out in full accordance with all standard caravan site licence requirements, such as minimum fire safety distances between each unit, etc.



Fig. 3 – Proposed layout of 'Springboks field'

- 3.0.4 The Springboks field, being some distance from the resort's centre, will prove to be a popular location for caravan users.

- 3.0.5 Gateway Resort is a well-established facility and holiday destination having been operating for many years but is considered to be under capacity in terms of the amount of accommodation space it can provide.
- 3.0.6 The Gateway Resort has a mainly open character comprising large grassed areas but there are a number of mature boundary hedgerows enclosing the individual caravan fields. There is also mature vegetation on or adjacent to the resort boundary, including that of the Springboks field.
- 3.0.7 All of the touring caravan fields relate to each other and cannot be described as appearing isolated. There is little separating distance from the main central activity area of the site, containing the various leisure facility buildings.
- 3.0.8 Currently, the Springboks field is within a short distance of all service connections and the main resort spine access road.
- 3.0.9 Electricity pick up points for each caravan pitch will be made available, as well as mains drainage connections. Each pitch is approximately 14 – 16 metres in length and sufficient for a touring caravan, awning and parking.
- 3.0.10 In visual terms, the proposed development will not be noticeably different from the other caravan fields elsewhere at Gateway.
- 3.0.11 Most of the touring caravans on site will be of standard dimensions and are expected to be twin axle.
- 3.0.12 Similar to the arrangements elsewhere, the touring caravans will connect to the existing foul water drainage system, electric point networks, etc. It is not necessary to upgrade the existing electricity supply nor the mains sewer.
- 3.0.13 There will be an “in and out” access and egress arrangement. The site access road will be a generous 5.5m width. Each touring unit will be provided with a minimum of one parking space each, and there will be sufficient opportunity for vehicle turning movements.

- 3.0.14 The majority of the field will be retained as mown grassland and an adequate number of recycling collection facilities will be provided.
- 3.0.15 It is worth emphasising that there will be no alteration to the alignment of the existing resort spine road that provides access to the individual caravan areas. There will be no new buildings required in respect of this proposal.
- 3.0.16 The landscaping of the site is likely to be controlled by condition but is expected to involve copious amounts of tree planting within the site layout. as well as boundary planting for screening purposes.
- 3.0.17 In terms of visual impact, it is important to consider the fact that people would be continually moving through the landscape along the coastal path and thus the development would only have a marginally discernible effect, if any, upon users' overall enjoyment of the landscape. The fact that the Springboks field will not be noticeable from the path is of further relevance.
- 3.0.18 The existing landscaping will continue to be important in moderating any negligible visual effect of the development. As mentioned above, any permission could be reasonably secured by condition in respect of additional landscaping and lighting details.
- 3.0.19 It follows that the proposed development would only have an imperceptible visual impact and therefore would not appear as an anomaly within the landscape. As such the proposal would not be harmful to visual quality and landscape character nor would it have an adverse impact upon the setting of the wider Gateway Resort.
- 3.0.20 A suitable condition to control occupancy and which has been used elsewhere reads:-  
*"The caravans shall be occupied for holiday purposes only and shall not be occupied as a person's sole or main place of residence. The site operator shall maintain an up-to-date register of the names of all occupiers of caravans on the site and of their main home addresses and shall make this information available at all reasonable times to the local planning authority."*

- 3.0.21 The touring caravans fall within the definition of a caravan in the *Caravan Sites and Control of Development Act 1960*, as supplemented by the *Caravan Sites Act 1968*. The definition refers to "*any structure designed or adapted for human habitation which is capable of being moved from one place to another, whether by being towed or by being transported on a motor vehicle or trailer, and any other motor vehicle so designed or adapted*", subject to certain exceptions.
- 3.0.22 The proposed touring caravans should not be considered permanent and will not display sufficient characteristics of permanency to be considered building operations.
- 3.0.23 The proposal is necessary to support the expansion of the existing tourism business in order to keep pace with a changing customer base and preferences. There is a demand for both touring and static caravan self-catering accommodation. The proposal would be commercially viable and whilst there is no evidence to suggest that the viability of the site would be at risk if the proposal did not proceed, it would provide a more secure income based upon not having 'all eggs in one basket'.
- 3.0.24 Gateway Resort is trying to rise to the increasing challenges of the fickle tourism and accommodation market, often heavily influenced by weather patterns, by improving its site layout and providing additional facilities. The submitted application is another important step in trying to meet the challenges being faced.
- 3.0.25 Previous FCAs have documented the potential flood risk to certain areas of land within Gateway Resort. These potential risks are acknowledged and it is therefore fitting that this proposal is not classed as highly vulnerable development and is therefore not contrary to the provisions of TAN15. A recently produced FCA accompanies this application.

## **4.0 PLANNING POLICY**

### **4.1 National Planning Policy**

- 4.1.1 Planning Policy Wales (PPW) (Edition 11) is the latest guidance setting out the direction of Welsh Government policy, with its holistic objective to accommodate both current and future needs. Regrettably, the document is silent on many day-to-day planning issues and instead focusses upon a number of nebulous paradigms and concepts.
- 4.1.2 The most dramatic change within PPW is the promotion and adherence to the socio-economic context provided by the “Well-being of Future Generations (Wales) Act 2015”, and thus aims to deliver the vision for Wales.
- 4.1.3 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 4.1.4 In addition, recent pandemic pronouncements by the Welsh Government emphasise the need for local planning authorities to place additional emphasis on development proposals that generate positive economic benefits. The proposals currently being considered for this location would undoubtedly comply with Welsh Government sentiments.

### **4.2 Local Planning Policy**

- 4.2.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is situated is the Carmarthenshire Local Development Plan (LDP). It is therefore the policies of this document that have been referred to in the preparation of the proposal.
- 4.2.2 It is acknowledged that the site is located outside any defined settlement boundary and therefore is defined as open countryside, where normal policies of restraint for new development apply.

- 4.2.3 The LDP provides context for the consideration of this development proposal and contains general development management policies, as well as site specific policies. The relevant extract of the LDP Proposals Map indicates that the site is not covered by any specific land use designations.
- 4.2.4 A number of LDP policies have been referred to in the preparation of this proposal including Policy GP1 - Sustainability and High Quality Design. Development proposals should be compatible with their surroundings in terms of siting, scale, height, massing, elevation treatment and detailing. Policy GP1 also advocates that proposals must not adversely affect local amenity in terms of visual impact, loss of light or privacy, disturbance and traffic movement. The policy requires the siting of proposals for development to have regard to the physical character and topography of the site and surroundings and to achieve and creates attractive, safe places and public spaces.
- 4.2.5 The proposal is located in an established sustainable location and will promote economic wellbeing as a consequence of its function and purpose. The proposed development complies with Policy GP1.
- 4.2.6 Other relevant Local Development Plan policies which are complied with include:-

#### Strategic Policies

*Policy SP1 Sustainable Places and Spaces*

*Policy SP14 Protection and Enhancement of the Natural Environment*

*Policy SP15 Tourism and the Visitor Economy*

*Policy SP17 Infrastructure*

#### General Policies

*Policy GP1 Sustainability and High Quality Design*

*Policy GP2 Development Limits*

*Policy GP4 Infrastructure and New Development*

#### Transport Policies

*Policy TR2 Location of Development – Transport Considerations*

*Policy TR3 Highways in Developments – Design Considerations*

## Design Considerations Environmental Qualities – Natural Environment

*Policy EQ3 Regional and Local Designations*

*Policy EQ4 Biodiversity*

*Policy EQ5 Corridors, Networks and Features of Distinctiveness*

## Environmental Protection

*Policy EP1 Water Quality and Resources*

*Policy EP2 Pollution*

*Policy EP3 Sustainable Drainage*

## Tourism

*Policy TSM2 Touring Caravan and Tent Sites*

*Policy TSM3 Small Scale Tourism Development in the Open Countryside*

- 4.2.7 It is evident that the submitted proposal will support the aims and objectives of both national and local planning policy and satisfies all relevant criteria.

## **5.0 CONCLUSION**

- 5.0.1 The application site is situated within the existing holiday/tourism complex of Gateway Resort.
- 5.0.2 This existing tourism/recreation destination is already functioning and, in order to survive, needs to grow. The economic benefits accruing from the proposal would be significant, not least in terms of investment and potential employment.
- 5.0.3 The proposal represents a respectful and sympathetic scheme which will have no detrimental effect on adjoining land uses and therefore adheres to the requirements of all relevant elements of both national and local planning policy.
- 5.0.4 This application supports the local economy. It does not represent sporadic development in the countryside – it is simply a legitimate intensification of a tourism accommodation use at a long-established holiday resort and destination.
- 5.0.5 It is therefore respectfully requested that planning permission be granted for the proposed development.