# Application Ref: NP/19/0522/FUL

Case Officer Applicant Agent Proposal	Andrew Richards Mr D Brown & ATEB Mr G Blain, Gerald Blain Ltd Outline planning permission for 14 affordable housing units. Full planning permission for the change of use of land from 85 tents & tourers to 85 static caravans with associated landscaping, distributor roads and new sewage pumping station		
Site Location	Buttyland Caravan & Camping Park, Manorbier, Tenby, Pembrokeshire, SA70 7SX		
Grid Ref Date Valid	28-Jul-2020	Target Date	21-Sep-2020

This application is reported to committee as the officer recommendation of approval is contrary to the views of the Community Council the application is also classed as a major development and has received third party objections.

### Consultee Response

Manorbier Community Council: Refusal as proposal is considered to constitute over development of the site and lack of traffic impact assessment.
PCNPA Planning Ecologist: Conditional consent
PCNPA Tree and Landscape officer: Conditional consent
Dwr Cymru Welsh Water: Conditional consent
Dyfed Archaeological Trust: No adverse comments
PCC Housing Strategy officer: Affordable housing need confirmed
PCC Drainage Engineers: No objections subject to SAB approval required
PCC Transportation and Environment: Conditional consent and informative
Natural Resources Wales: No objection

### Public Response

Neighbour notification letters were posted and a site notice erected in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Letters of objection were received from local residents and also the Friends of Pembrokeshire Coast National Park. The material objections are summarised below and full copies of the objections are available to inspect on the application file:-

- Contrary to LDP policy
- Harmful visual impact on the surrounding landscape and on the special qualities of the National Park
- No need for additional affordable housing and its proposed siting also causes concern
- Impact from affordable housing on surrounding landscape and infrastructure
- Lack of information to support the application
- Lack of a suitable buffer between the development and the school

- Privacy and noise impacts between the existing school and proposed residential housing development
- Impact from overspill carpark on nearby residential properties and the moving of the recycling centre to accommodate the new overspill car park
- Loss of established hedgebank and trees to create new pumping station access
- Housing layout, density and design not considered to be acceptable
- Traffic increase and highway safety
- Sewer capacity
- Local electricity sub-station is already nearly at capacity
- School is at capacity and the proposed development should not be built so close to the facility
- Light pollution impact
- Traffic assessment needed and visibility sight lines queried
- No need for proposed workshop structure

The majority of the objections are addressed in the main body of the report, however, the following comments are made in relation to objections not covered:-

- In respect for the need and amount of affordable housing Planning Policy Wales 10, which states at para 4.2.25 that 'A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications . Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers'. This development would meet a proven need for affordable housing to serve the Community Council area.
- In respect of the concern in relation to light pollution, if the application were recommended for approval it would be subject to a condition requiring a lighting scheme to be submitted to and agreed in writing by the local planning authority.
- The most recent Pembrokeshire County Council's Admissions to Schools information confirms that there is capacity for 86 pupils, with the current number on the roll being 59. The development would, therefore, not be considered to result in unacceptable pressure on the local school.
- If the caravans were considered acceptable a condition could be attached to any permission granted to ensure that the caravans are not used as permanent residences.
- The majority of the proposed properties are to be provided by a registered social landlord who would assess the viability of a scheme prior to progressing it.
- Officers have tried to contact the local electricity department to query the local capacity without reply. It is considered that this aspect will be address as part

of any formal request to the local electricity department for new connections at the appropriate time.

### Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website http://www.pembrokeshirecoast.org.uk/default.asp?PID=549

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 30 - Amenity

- LDP Policy 35 Visitor Economy
- LDP Policy 37 Self-Catering Development
- LDP Policy 38 Camping, Touring Caravans, Statics and Chalet Sites

**PPW10** 

SPG06 - Landscape

Local Development Plan 2 Inspector's Report

# **Constraints**

LDP Allocation LDP Mineral Safeguard LDP Open Space Historic Landscape Potential for surface water flooding LDP Centre:50pc aff housing;30 units/ha Recreation Character Areas Affordable Housing Submarkets

# Officer's Appraisal

### Description of Development and Site

The current application is a '**hybrid**' **application**; that is, one that seeks outline **planning permission** for one part and full **planning permission** for another part of the same site.

The amended hybrid application seeks planning permission for the following:-

- Outline consent with all matters reserved for 14 No. Affordable housing units
- Full planning permission for upgrading of existing caravan park from 70 seasonal touring pitches and 15 tents pitches to 85 year round static caravans
- Full planning permission for new sewage pumping station

The proposed affordable housing will be comprised of a mixture of 2, 3 and 4 bedroom two storey houses and 1 and 2 bedroom bungalows, with associated car parking and gardens. Access to the site will be gained via the highway to the west.

The upgrading of the caravan park proposes changing the existing permissions on the site from 70 tourers and 15 tents to 85 static caravans, with associated landscaping.

A sewerage pumping station is also proposed along the northern boundary of the caravan site and access to this will be gained via a proposed separate access point directly off the highway.

The application site is a long established caravan site located on the eastern flank of Station Road running north toward Manorbier Station. The caravan site area straddles the Rural Centre boundary, as defined by Policy 6 of the Local Development Plan, with the eastern part of the site (the caravan and camping site) falling in the open countryside.

Note that the initial application included the provision of 2 full market dwellings which were omitted from the overall scheme due to a recent change in planning policy considerations following the receipt of the Inspector's final report into LDP2.

### **Relevant Planning History**

NP/18/0700/FUL – Proposed winter storage of 35 touring caravans from 28th September to 28/29th February in any year in addition to and on the same site as existing planning permission NP/13/0260 for 35 touring caravans – Refused 16<sup>th</sup> January 2019

NP/18/0643/FUL – Vary condition 2 and remove condition 5 of NP/15/0526/FUL to allow for restaurant at first floor level – Refused 15<sup>th</sup> January 2019

NP/18/0559/FUL – 14 affordable housing units, 2 open market houses and upgrading 85 tents and tourers to 85 static caravans with associated landscaping and roads including new pumping station – Refused 23<sup>rd</sup> January 2019

NP/18/0543/DOC – Discharge condition no's 2 & 5 of NP/17/0258/FUL – Refused 25<sup>th</sup> October 2018

NP/18/0212/DOC – Discharge condition no's 2, 3 & 6 of NP/17/0229/S73 – Discharged  $30^{th}$  July 2018

An Environmental Impact Assessment (EIA) Opinion was sought prior to submission to ascertain whether an EIA would be needed to accompany the application. The opinion of the Authority was that an EIA was not necessary (NP/17/0221/SCO refers)

NP/17/0691/FUL - 14 affordable houses, 2 open market houses, 85 static caravans and pumping station – Withdrawn 5<sup>th</sup> June 2018

NP/17/0597/S73 - Variation of conditions 2 & 5 of NP/15/0526/FUL (Clubhouse) – Withdrawn 24 January 2018

NP/17/0596/CLE – Use of the south field as a touring & camping field for up to 140 touring caravans and tents at any one time on a seasonal basis for holiday purposes only from 1st March up to 28th September in any one year - Refused 27/11/2017

NP/17/0258/FUL - Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of porta cabin as a temporary reception office. – Approved 9<sup>th</sup> August 2017

NP/17/0229/S73 – Vary condition no. 2 of NP/15/0526/FUL - Alterations to Clubhouse – Approved 9<sup>th</sup> August 2017

NP/17/0082/FUL – Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of porta cabin as a temporary reception office, extend holiday season and winter storage - Refused 10<sup>th</sup> April 2017

NP/17/117/NMA – Non-material amendment alteration in fenestration material – Approved 8<sup>th</sup> March 2017

NP/17/171/NMA – Non-material Amendment – Increase in height of building – Withdrawn  $6^{th}$  April 2017

NP/16/0502/FUL – Amendment to NP/15/0526/FUL comprising change of use of first floor staff/managers accommodation to guest rooms and alterations to clubhouse - Withdrawn 6<sup>th</sup> February 2017

NP/15/0526/FUL – New Club House – Approved 16th December 2015.

NP/15/0131/FUL - 35 No. Caravans for winter storage in the western field -  $10^{th}$  January –  $28^{th}$  February - Approved  $3^{rd}$  June 2015

NP/13/260/CLE - 35 No. touring caravans or tents in the northern field –  $1^{st}$  March –  $28^{th}$  September – Granted  $8^{th}$  August 2013

NP/464/93 – Use of site for 35 touring caravans and 15 tent pitches between – Approved 1994

# Key Issues

The application raises the following planning matters:

- Policy and Principle of the Development
- Visual Amenity and Special Qualities of the National Park
- Neighbouring Amenity
- Highway Safety
- Biodiversity
- Drainage

There has been extensive pre-application discussion by your officers with the agent and landowner and the housing association regarding the principles of such an application. Your officers considered there was potential to release an allocated housing site and provide long term environmental gains through the development of strategic landscaping and improved sewerage for the settlement. However, such a proactive and holistic planning solution requires a negotiated package – including land transfer, timing and construction phasing, all which would require legal agreements to secure the planning gains. A draft legal agreement has now been received.

### Policy and Principle of the Development

### LDP1

The site is partially within the Centre boundary for Manorbier Station, as defined in the Local Development Plan.

The area of the site within the Centre boundary for Manorbier Station is allocated in the Local Development Plan for mixed use. The reason for this was that when the Local Development Plan was being prepared the Education Authority (Pembrokeshire County Council) was uncertain about proposals to possibly extend Manorbier School. Following adoption of the Local Development Plan the Education Authority advised that they no longer required any land within the allocation. It is therefore considered appropriate to use the entire allocation for residential development.

The development of the allocated land for 14 affordable houses is acceptable in terms of the Local Development Plan, subject to the usual development control matters such as layout, design, access etc. Which would be subject to future reserved matters applications.

The remainder of the application site is outside the Centre boundary for Manorbier Station. It is currently used as a camping and caravanning site which has increased in size incrementally, in part gaining planning permission retrospectively. The visual impact of the site locally is significant in views from the north.

Policy 38 of the Local Development Plan sets out the Authority's policy on camping and caravanning sites which is one of controlling further provision. The proposal is seeking to amend the type of caravans on the site from touring and tent pitches to static pitches. The case is made by the applicant's agent that these units are not so weather-dependent and therefore extend the tourist season. By virtue of that fact the impact they have on the landscape is also increased.

The Authority has permitted a change over from touring caravan to static pitches on other sites within the National Park where the number of overall units has been reduced (sometimes to reflect the fact that static units are larger and have greater visual impact on the landscape) or where environmental improvements have been made to help reduce the overall impact of the site. It is noted that since the time of that previous application (NP/18/0559) much improved landscaping proposals have been submitted as part of the current application which will help to mitigate and

enhance the overall environmental visual impact of the development when viewed from within the site and within its context within the surrounding landscape.

This will also help to achieve compliance with Policies 1, 8 and 15 of the Local Development Plan which seek to protect the National Park and its special qualities from inappropriate development or intensification of development which would harm the locality. Therefore, the proposal including the improved landscaping and the removal of the two market dwellings from the site, is considered to be compatible with the policies of LDP1. The principle of the development is considered acceptable against LDP1.

# LDP2

The Inspectors Report on the soundness of LDP2 was received by this Authority on the 13th May 2020. The requirements are that the Plan should be adopted within 8 weeks of its receipt due to the persisting exceptional circumstances relating to the Corvid-19 restrictions limiting public access to documents, the Plan will be reported to a future National Park Authority meeting for Adoption. In the interim the inspector's report has been made available on the National Park Authority website to help provide a context for Development Management Committees and applications determined through the delegated powers process. The findings in the Inspector's Report are binding on the Authority and although not yet formally adopted by the Authority, the policies in LDP2 now become a material consideration of significant weight.

The site is no longer allocated for residential use and has been taken out of the Centre boundary for Manorbier Station. Policy 7 of the Plan, as amended by MAC15 is relevant. This Policy sets out the types of development that may be permitted in the countryside and includes the release of land adjoining Centres for affordable housing to meet an identified local need.

Policy 39 of the Plan is the strategic visitor economy policy and allows for limited caravan, camping and chalet development. This is based on a study undertaken in 2015 to establish the capacity of the National Park landscape to absorb further such development. The study took into account the presence of existing sites. The site is within Landscape Character Area 4 and concludes that within this area there is scope for improvements within existing sites to achieve a reduction in visual impact. Mitigation guidance includes reducing density of caravans and interspersing with green areas and native trees. Changing the colour of caravans to less obtrusive shades is also suggested. The proposed landscaping plan submitted with this application takes several of the suggestions into account and additional landscaping within and around the site will help to reduce visual impact from its current level.

Policy 42 of the Plan (as amended by MAC54) adds further detail when considering proposals for caravan, camping and chalet proposals. It requires new units to be sited where they can be readily assimilated into the landscape without causing an unacceptable adverse effect of the National Park landscape; there are no unacceptable adverse cumulative effects when considered in conjunction with other development in the locality and enhancement opportunities achieve and overall environmental improvement whereby there are clear benefits in reducing the impact on the surrounding landscape. The current application, with a much improved

landscaping scheme will achieve this overall improvement from the current situation and the masterplan shows that the layout of the caravan park will help to consolidate the overall appearance of the site.

These improvements to the proposal will also help to meet the requirements of policies 1, 8 and 16 of the Plan which seek to protect the National Park landscape and its Special Qualities.

Policy 31 of the Plan (as amended by MAC45) considers the amenity enjoyed by people living working or visiting the National Park. Whilst compatible, the adjacent residential and caravan uses will need to ensure that the amenity of the occupants of either is not detrimentally impacted. This will be achieved through the current site plan which adopts a layout that has sensitive orientation and appropriate separation distances between the units and neighbouring development.

Therefore, the proposal including the improved landscaping and the removal of the two market dwellings from the site, is considered to be compatible with the policies of LDP2. Delivery of affordable housing is a priority of the Authority through LDP2 and certainty of delivery will be assisted by means of a S106 Agreement to ensure early and appropriate transfer of the housing site to a housing association. The principle of the development is also considered acceptable against LDP2.

### Visual Amenity and Special Qualities of the National Park

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP1 and LDP2) are strategic policies which refer to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Particularly relevant to this application are priority a) sense of remoteness and tranquility is not lost and wherever possible enhanced and c) pattern and diversity of the landscape is protected and enhanced.

Policy 15 of LDP1 and Policy 16 of LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria 'd' and 'e' resists development that would fail to harmonise with, or enhance, the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Policy 29 of the LDP1 and Policy 30 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

The application site lies within Landscape Character Area 4 (Manorbier/Freshwater East) as defined by the Landscape Character Assessment (LCA) Supplementary Planning Guidance (SPG). The area's special qualities are listed in this document, one of which is as follows:-

# 'There is a very strong historical and cultural sense of place here, which is very different from that encountered in north and west Pembrokeshire, typified by the

Medieval open field system which has survived remarkably well in the area - the stripfields which lie either side of the Ridgeway between Lamphey and to the south of St Florence. The wealth of historical and archaeological sites documented means that extensive areas of historic landscapes have an outstanding value attributed to them. Of particular note are the medieval buildings: the Lamphey Bishop's Palace, a moated house site at Hodgeston and the extremely well preserved manorial landscape of Manorbier, with its imposing castle dominating the village scene, the prominent church and a dovecote. The historical value in turn supports'

Within this LCA caravan sites and modern housing are noted as visual detractors and management guidelines include measures to improve the integration of tourism development into the landscape and regular cyclical management of hedgerows.

The area also lies within LANDMAP Visual and Sensory Aspect Area PMBRKVS059 evaluated as Moderate, and within Historic Landscape Aspect Area PMBRKHL46082 evaluated as Outstanding for its prehistoric/medieval strip fields. However, it is noted that the site does not lie within the strip field system or include traditional stone faced Pembrokeshire hedgebanks.

Natural Resources Wales (NRW) advise that the site is of high sensitivity, lying as it does within the National Park and comprising open fields and hedgerows, though with touring caravans and tents during the summer months. This would change to permanent housing and static caravans, roads and hard surfacing. It is considered that the impact on the site to be major/moderate adverse, reducing with time as landscape mitigation takes effect if approved. Beyond the site, effects on LCA 4 are considered minor in the submitted appraisal but NRW consider these to be likely moderate in the locality of the site, reducing to minor at distances of approximately 1.5km from the site.

During the Pre-application Consultation NRW had been consulted and advised that any further planning application should be accompanied with a Landscape Assessment of the scheme. A Landscape and Visual Statement (LVS) has now been submitted in support of the planning application and officers have visited the site and surrounding landscape with NRW officers to assess this document and consider the proposed development.

The applicant has submitted an amended landscaping scheme in order to attempt to provide mitigation against the visual impact of the proposed 85 static caravans. Whilst the site boundaries comprise hedgebanks with trees which are mainly to be retained, many of these boundaries are thin with lots of gaps and provide very little screening in the winter months. Some trees have already been pruned / removed during a recent site visit and sections of hedgerow would require removal for the two new access points.

In terms of landscaping, the application proposes an appropriate level of increase to the screen planting around the caravan site boundaries, some central planting areas and a wildlife area with the aim of improving the environment of the site and its setting in the surrounding landscape. The majority of the existing trees and hedges to the site boundaries are to be retained with the removal of 25m of roadside hedge for access to the proposed pumping station.

In terms of the impact of the development on the wider setting, it is considered that the proposal to allow 85 static caravans in place of seasonal touring and tent pitches would result in a large extension to the built form of the existing village, outside of the rural centre and has the potential for detriment impact of the rural character of the area without the proposed level of landscaping being provided within the current scheme. However, the amended scheme provides sufficient landscaping to mitigate and enhance the existing visual situation. NRW are content with the landscaping proposed and its impact on the surrounding landscape.

It is recognised that the proposed landscaping will take some time to establish but this site already benefits from an element of mature landscaping and as the proposed landscaping will establish over the first five years the level of existing landscaping will assist this aspect by providing shelter from adverse weather which should encourage a faster growth of the new native planting scheme.

The proposed static caravans will measure 12.76m in length by 3.64m in width and reach a maximum height of 3.24m. Each caravan will have a private deck area and will be finished with aluminum cladding, UPVC glazing, and onduline pantile roof.

In respect of the housing, this element is located on an area which is currently used for caravans all year round (winter storage area) and is within the built form of Manorbier Station, as such, the proposed houses are not considered to have an adverse impact on the wider landscape. In terms of design, the dwellings are traditional in form and materials and additional landscaping could be dealt with by means of conditions. However, exact details will be determined at a future reserved matter stage

In respect of the pumping station, the details submitted indicate that there will be a significant amount of hard standing proposed together with boundary fencing, there is the potential that this would have a detrimental urbanising visual impact on the rural character of the area as the Roadside hedgerow in particular is considered to be a strong feature in the landscape at this location and the loss of a small section as a result of the development has been mitigated for within the site as the current proposal includes the translocation of this existing hedgebank to form part of the boundary of the pumping station compound.

Other landscaping around this area will also assist in screening this area from the wider landscape but given the nature of the use of this compound and the requirement for vehicles to access it there will be some visual impact from the hard landscaping on the immediate landscape when viewed from the adjacent road which cannot be mitigated against. Officers consider that this impact is limited to this small area and the current application when considered as a whole can be supported.

NRW welcome the revised landscape strategy, which is now considered to fully address the previous concerns raised. They note the inclusion of additional native tree planting which would assist in integrating the development with its surroundings in the long term. It is important to ensure that there is a good proportion of larger growing species in the tree mix i.e. Oak, Aspen, Alder and Wild Cherry and this aspect will be covered by a condition on any permission granted.

NRW have recommended that a Landscape and Ecological Management Plan for the site is required to ensure the success of the proposed mitigation and this will also be linked to a section 106 agreement. In addition the agent has provided further information on the proposed materials and colours to be used for the proposed static caravan units and associated decking areas. Officers consider that Sierra Brown panels are likely to be recessive and less visible than the paler Sandalwood and is therefore preferred for the walls and decking and this will be secured through a planning condition.

Planning conditions will be imposed on any permission granted to ensure that all new electricity or telephone supplies to the site shall be by underground cables only. In addition the scale and layout of the residential plots are small and any further alterations and extensions to these dwellings will need to be carefully considered to ensure amenity space is maintained. As such, a condition will also be imposed to remove permitted development rights from these dwellings to ensure that the local planning authority can formally consider any further proposed extensions.

The specific need for a proposed workshop structure is considered to be acceptable within this application given the scale of the site and that the existing storage structure is to be removed to provide the area for the overspill car park as part of the current scheme. Therefore, the proposed location and design is considered to be appropriate in this instance and will support the ongoing maintenance of the site.

Therefore, it is considered that the amended scheme can be supported in terms of its impact on the visual amenity and special qualities of the National Park and the landscaping scheme can be supported in terms of the LDP1 and LDP2.

# Neighbouring Amenity

Policy 30 of LDP 1 and Policy 31 of LDP 2 refers to matters of amenity, and requires proposals to be appropriate to where people live and work, compatible with its setting, should not lead to an increase in traffic, odour, noise or light, and should not be visually intrusive.

The application proposes a residential development which would generate some amount of noise, however, the residential noise associated with these 14 dwellings on an allocated site is not considered to be so significant as to warrant refusal of the application.

In respect of the 85 static caravans, again these would be year round caravans and some increase in noise would be expected. However, this noise again would be similar to residential noise and is not considered to generate an unacceptable level of noise.

In respect of the amenity of future occupiers of the dwellings they have been designed so as to ensure there is no adverse overlooking, overshadowing or dominance. Whilst the gardens are modest in scale they are considered to be proportionate to the scale of the dwellings proposed, which are also modest.

Concerns have been raised in respect of amenity from the proposed new car park overspill and recycling areas within the site. Officers consider that these areas are required to support the proposed static caravan site as each static unit only has two parking spaces directly associated and each unit will have three bedrooms so could potentially generate more than two vehicles for each unit and therefore the overspill area will ensure that these vehicles are contained within the site.

In respect of the recycling area which will be located adjacent to the internal access road this is considered to form an important facility to ensure the waste generated from the 85 holiday units is appropriately stored within the site before being taken away for processing. Specific details of this area will be required by way of condition.

Having regard to the above the proposed development is considered to be acceptable in terms of amenity and complies with policy 30 of the LDP1 and Policy 31 of LDP 2.

### Highway Safety

The objections received raised concerns in respect of highway safety and the need for a traffic assessment.

The application has been assessed by the Highways Authority which considers that the proposed change to static caravans will not lead to an increase in peak traffic generation from the site and there will be a highway safety benefit of a reduction in touring caravan movements on the approach roads.

In respect of the proposed housing, existing site access and the pumping station entrance the Highway Authority has raised no objection to the development in terms of highway safety subject to a condition requiring detailed plans of the access roads including levels, gradients and disposal of surface water. The submission of a Construction Phase Traffic Management Plan will also be required by condition to agree details of vehicle sizes, movements for deliveries, routes, timing to avoid peak activities and measure to maintain road safety. Other conditions would cover works within the site in respect of access and parking etc. As such, the concerns raised are not shared with the Highways Authority.

The proposal is therefore in accordance with Policy 53 of LDP1 and Policy 58 of LDP2.

### **Biodiversity**

Policy 11 of LDP 1 and Policy 13 of LDP2 refers to the protection of biodiversity, and requires that development that would impact on habitats and species will only be permitted subject to suitable mitigation.

The ecological report by Habitat Matters updated June 2020, concluded that the site has very low potential to support wildlife, with the roadside hedge offering the most ecological value. The proposed landscape strategy received on 27<sup>th</sup> July 2020 details biodiversity enhancement measures including – a bug hotel, wildflower, shrub and tree planting and retention and enhancement of existing hedgerows along

Northern and Eastern boundary). The scheme also includes a small number of low level bollard lights, they will ensure nocturnal wildlife such as bats will not be impacted by excessive light spill from the proposal.

To ensure there is no adverse impact upon ecology the development must be carried out strictly in accordance with the current landscape strategy and each new dwelling will need to include either a bat or bird box in an appropriate location as enhancement. In addition works affecting vegetation/hedgerows on site will need to avoid the bird nest season and all external lighting on the new dwellings must be low level, downward facing, hooded and on a PIR activated timer. These aspects will be controlled though conditions and an informative on the bird nesting season.

# Drainage

Policy 29 of the LDP requires all development proposals to be well designed in terms of water and drainage (criterion 'h'), Policy 32 requires development proposals to incorporate sustainable drainage systems for the disposal of surface water on site.

The Drainage Department at Pembrokeshire County Council was consulted as part of the application and has raised no objection to the proposal in respect of surface water drainage subject to a note to advise the applicant that separate consent will be required through the Sustainable Drainage Approval Body (SAB) at Pembrokeshire County Council.

In respect of foul water drainage the application proposes a pumping station to the north western boundary of the site, which will be served by its own separate access, and will serve both the proposed static caravan site and the housing development. Welsh Water /Dwr Cymru have assessed the scheme and have no objection subject to conditions relating to the approval of a suitable drainage scheme and that the marking of the public sewer which crosses the site be completed before work commences on site.

# Conclusion

Notwithstanding the objections received, following consideration of the policies contained within the Local Development Plans 1 and 2 and National Planning Policy in the form of Planning Policy Wales (Edition 10, December 2018) and having regard to all material considerations it is considered that the development The development will be in keeping with the aims of the LDP1 and LDP2 in that the development will conserve and enhance the existing character of the site and the special qualities of this area of the National Park. As such, and subject to a S106 Agreement to secure the transfer and delivery of the 14 affordable housing units and to revoke any other consents or lawful uses on this site together with a schedule of suitable conditions to control the development, the development is considered to be acceptable and complies with the requirements of Local Development Plans 1 and 2.

# Recommendation

That the application be delegated to the Chief Executive/Director of Planning / Team Leader to grant part outline and part full planning permission subject to the

conditions as outlined within the report and completion of the Section 106 Agreement in respect of the provision of affordable housing within 3 months of this meeting. The Section 106 legal agreement will be required within three months of the date of the meeting, and if not received within this time, officers will refuse the application as the development would not accord with policy.

## **General Conditions**

 A construction phase traffic management plan will be agreed in writing with the Local Planning Authority including details of maximum vehicle sizes and numbers and routes to be used along with times at which deliveries will occur to avoid conflict with peak activities, and any measures required to maintain road safety. Prior to commencement of the development the details agreed under this plan shall be fully implemented and kept in place for the duration of the construction works.

**Reason:** To ensure adequate and safe access is achieved during the construction period. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity) and 15 (Conservation of the Pembrokeshire Coast National Park), Policy 30 (Amenity), Policy 53 (Impacts on Traffic) and Planning Policy Wales (Edition 10, December 2018) – Chapter 13 (Minimising and Managing Environmental Risks and Pollution).

2. No development, demolition or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme relating to the immediate landscape. The approved scheme shall include the following details:

Arboricultural Impact Assessment (AIA)

Arboricultural Method Statement (AMS)

Landscaping details including:

Hedgebank translocation

Wildflower species details

Landscape implementation and management

Arboricultural observation and adherence confirmation

The submitted scheme shall include a mix of larger growing tree species to include Oak, Aspen, Alder and Wild Cherry.

**Reason:** In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity), Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009) and Technical Advice Note (TAN) 10: Tree Preservation Orders (1997).

**3.** No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface and land water, and

include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system. **Reason:** To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan – Policy 29 (Sustainble Design) and Planning Policy Wales (Edition 10, December 2018) – Chapters 12 (Infrastructure and Services) and 13 (Minimising and Managing Environmental Risks and Pollution).

- 4. The proposed development is crossed by a public sewer with the approximate position being marked on the attached informative note (Statutory Public Sewer Record). The position shall be accurately located, marked out on site before works commence and no operational development shall be carried out within 3 metres either side of the centreline of the public sewer. Reason: To protect the integrity of the public sewer and avoid damage thereto protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan - Policy: 32 (Surface Water Drainage).
- Works must be undertaken in strict accordance with the Extended Phase 1 Habitat Survey - June 2020 (Received:24.06.2020)
   Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity) and 15 (Conservation of the Pembrokeshire Coast National Park).
- 6. A biodiversity enhancement scheme to include provision of an integrated bird or bat box on each new dwelling, in an appropriate location away from any external lighting shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancement scheme shall be undertaken and/or installed prior to the first beneficial use of the development hereby approved, in accordance with the approved details. Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).
- Any external lighting on the proposed dwellings must be low level, downward facing, hooded and on a PIR activated timer.
   Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately

protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity) and 15 (Conservation of the Pembrokeshire Coast National Park).

The off-street parking facilities (for all vehicles, including cycles) shown on the plan hereby approved shall be provided before the building is first occupied, and thereafter retained for that purpose.
 Reason: To ensure the satisfactory provision of parking facilities and in the interest of highway safety and the amenity of the area. Policy: Local Development Plan - Policy 53 (Impacts on Traffic).

# Static Caravan Site Element (Detailed)

 The development of the 85 Static Caravan units and associated works shall begin not later than five years from the date of this decision.
 Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

**10.** The development shall be carried out in accordance with the following approved plans and documents: Drawing Reference: 849/LOC/Rev G (Received: 03.07.2020) Drawing Reference: 849/Exist/Rev G (Received: 01.10.2019) Drawing Reference: 849/Eng/Rev G (Received: 03.07.2020) Drawing Reference: 849/MAS/Rev G (Received: 03.07.2020) Drawing Reference: 849/200/1/Rev A (Received: 10.06.2020) Drawing Reference: 849/Type 1/Rev A (Received: 01.10.2019) Drawing Reference: 849/Type 3/Rev A (Received: 01.10.2019) Drawing Reference: 849/Type 4/Rev A (Received: 01.10.2019) Drawing Reference: 849/Type 5/Rev A (Received: 01.10.2019) Drawing Reference: 849/Type 6/Rev A (Received: 01.10.2019) Drawing Reference: 849/RECY (Received: 12.02.2020) Drawing Reference: 849/Workshop (Received: 12.02.2020) Drawing Reference: Suggested Materials Palette (Received: 28.05.2020) Drawing Reference: EDP5474 d001f Plan (Received: 03.07.2020) Drawing Reference: 19381/P1 – Existing Site Survey Plan (Received: 03.10.2019) Drawing Reference: 19381/P1 – Adoptable Foul Water Pumpiing Station Plans (Received: 03.10.2019) Drawing Reference:19381/P2 (Received: 03.10.2019) Drawing Reference:19381/P3 (Received: 03.10.2019) Drainage Strategy Report (Received: 01.10.2019) Design and Access Statement – Revised July 2020 (Received: 27.07.2020) Extended Phase 1 Habitat Survey - June 2020 (Received: 24.06.2020) Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

- 11. The development hereby permitted shall be carried out in accordance with the submitted plans and details, with no more than 85 static caravans as defined within the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 sited at any one time in the positions shown on the approved drawing reference: EDP5474\_d001f Plan (Dated: 03.07.2020). Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
- 12. The caravan(s) shall be occupied as holiday accommodation only and shall not be occupied as a person's sole or main place of residence. An up to date register shall be kept at the holiday accommodation reception building and be made available for inspection by the local planning authority upon request. The register shall contain details of the names off all of the occupiers of the accommodation, their main home addresses and their date of arrival and departure from the accommodation.

**Reason:** In order to ensure that the accommodation is occupied solely for holiday letting purposes only and not for any other residential purpose. Policy: Local Development Plan – Policy 37 (Self Catering Development).

- 13. Details of secure refuse storage facilities and collection arrangements shall be submitted prior to the LPA. The approved details shall be implemented prior to the occupancy of a caravan and shall be retained and maintained in clean working order in accordance with the approved details.
  Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
- 14. Notwithstanding the details submitted on the colours for the wall cladding on the static caravans and associated decking, Sierra Brown colour is to be used on the wall cladding and associated decking.
  Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
- 15. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (relating to temporary buildings, uses and caravan sites), no development of Parts 4 and 5 of Schedule 2 to that Order (or any Order revoking or re-enacting that Order) shall be carried out without specific planning permission being obtained.
  Reason: To preserve the character of the area. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

# **Residential Housing Site Element (Outline)**

16. Any application for approval of the reserved matters on the 14 new affordable dwellings and associated development shall be made to the local planning authority not later than three years from the date of this permission.
Reason: Required to be imposed pursuant to Section 92 (2) of the Town and Country Planning Act 1990.

17. The development of the 14 new affordable dwellings shall begin either before the expiration of five years from the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.
Reason: Required to be imposed pursuant to Section 92 (2) of the Town and Country Planning Act 1990.

- 18. The reserved matters application(s) shall follow the scaled parameters for all the 14 new affordable dwellings within the development site as set out on drawing references: 849/Type1/Rev A, 849/Type3/Rev A, 849/Type5/Rev A & 849/Type6/Rev A (All received 01.10.2019). The development shall be carried out in accordance with the approved details. Reason: To ensure a proper standard of development and appearance in the interests of conserving the amenities and architectural character of the area. Local Development Plan Policies 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity).
- 19. Detailed plans shall be submitted showing levels, gradients and construction for the estate road, and to include details of the collection and disposal of surface water from the access road, and these plans must be approved before any construction work commences on site.
  Reason: To ensure a satisfactory standard of estate road design. Policy: Local Development Plan Policy 53 (Impacts on Traffic).
- **20.** Before any housing construction work is commenced the access, estate road and turning area must be constructed up to and including road base level and be suitably drained for the use of construction traffic and approved visibility splays constructed.

**Reason:** In the interests of road safety and to ensure that no deleterious material is carried onto the road. Policy: Local Development Plan (Policy 53 - Impacts on Traffic).

**21.** Before any housing construction work is commenced adequate and suitable areas shall be provided within the site for the parking and turning, loading and unloading of all vehicles attracted to the site and for the storage of building materials clear of the public highway.

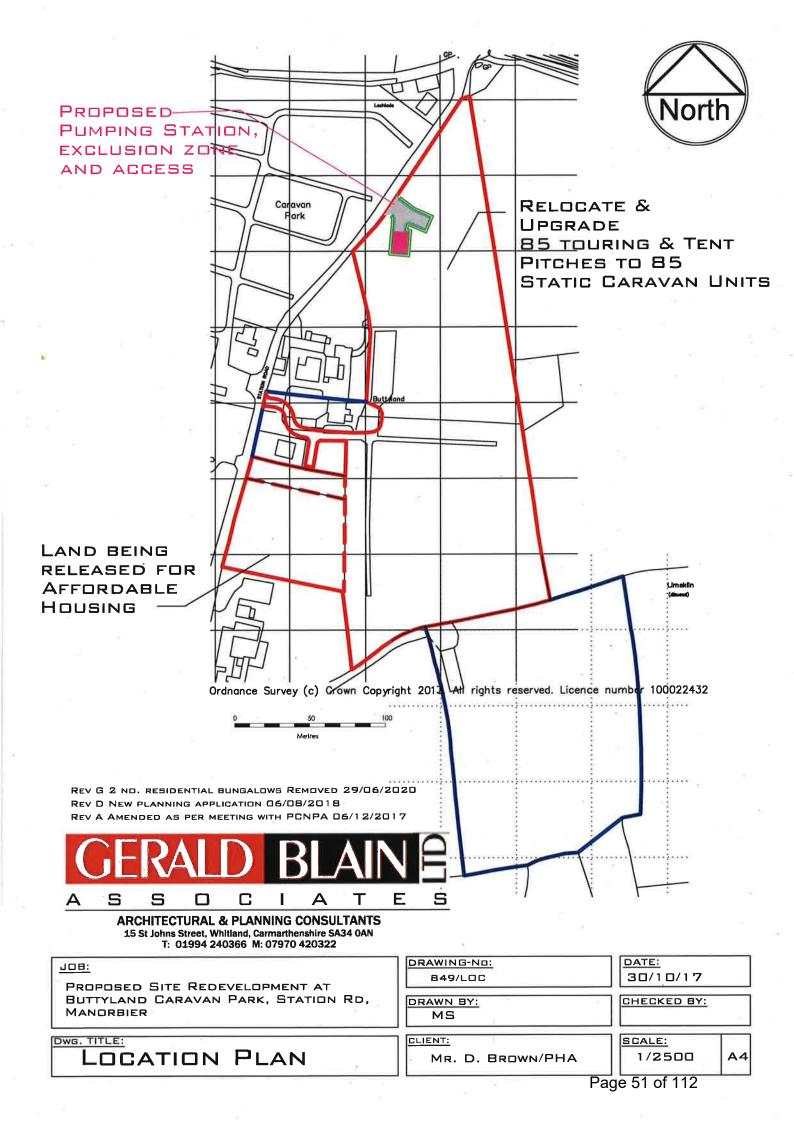
**Reason:** To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan - Policy 53 (Impacts on Traffic).

- 22. Before any affordable dwelling is occupied the access roads and footways from the existing public highway shall be laid out and constructed to at least surface base course levels up to that dwelling.
  Reason: In the interests of public amenity and convenience. Policy: Local Development Plan Policy 53 (Impacts on Traffic).
- **23.** Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (relating to extensions to, and changes to the external appearance of, the dwelling and to development or the siting of a caravan within the curtilage of the dwellinghouse), no development of Parts I, 2 and 5 of Schedule 2 to that Order (or any Order revoking or re-enacting that Order) shall be carried out without specific planning permission being obtained.

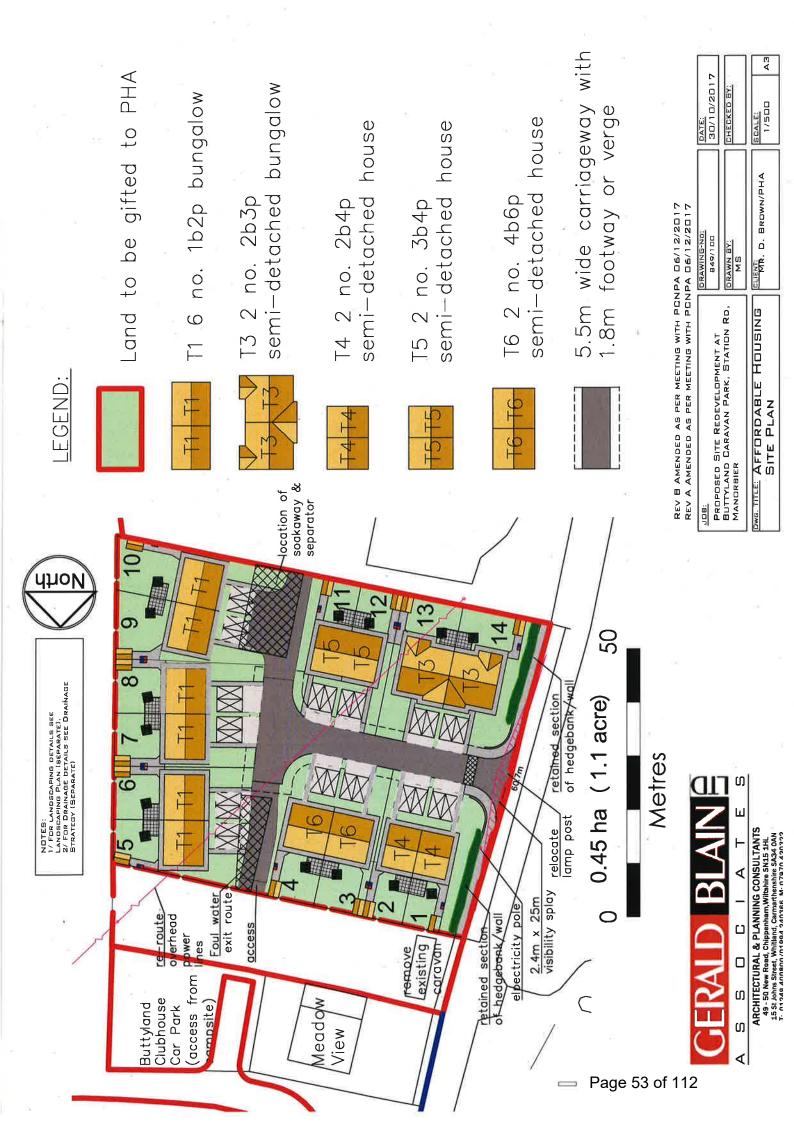
**Reason:** To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

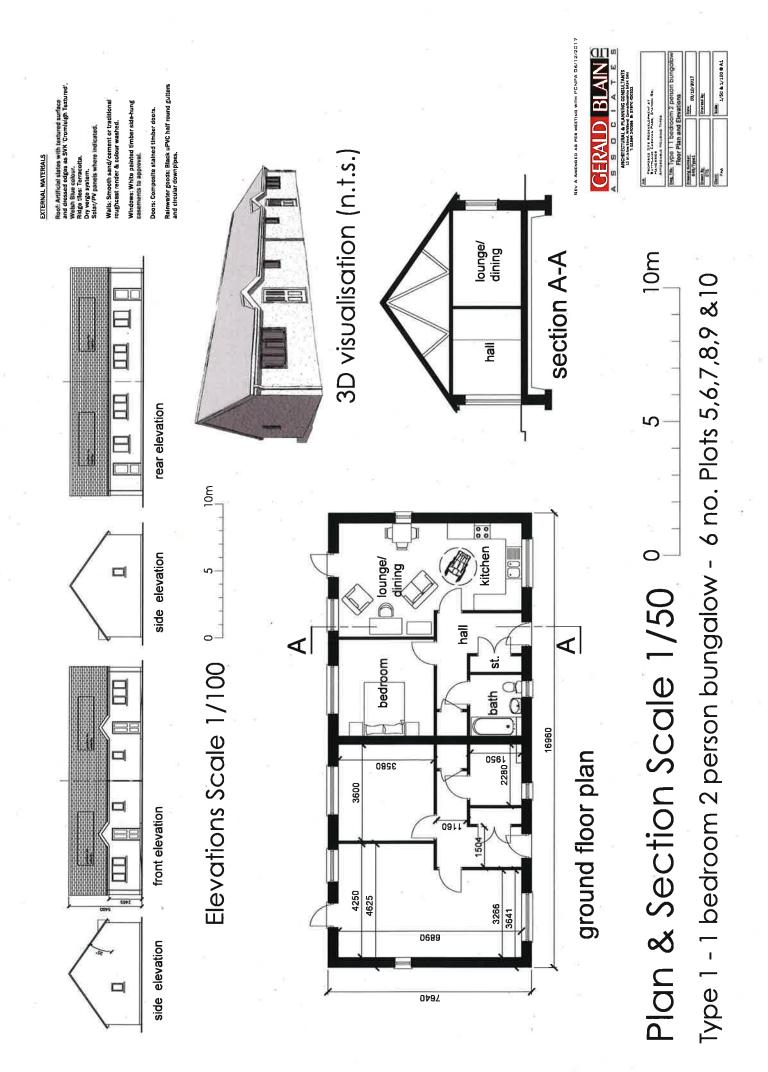
24. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (or any Order revoking or reenacting that Order) any electricity or telephone supplies to the site shall be by underground cables.

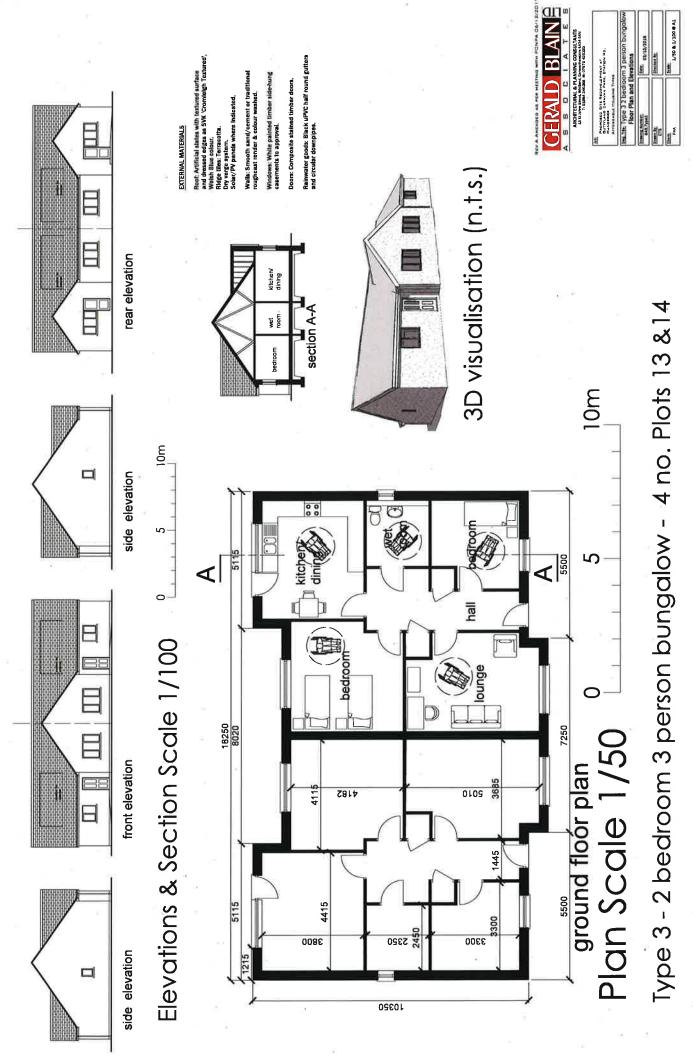
**Reason:** To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty) and 15 (Conservation of the Pembrokeshire Coast National Park).



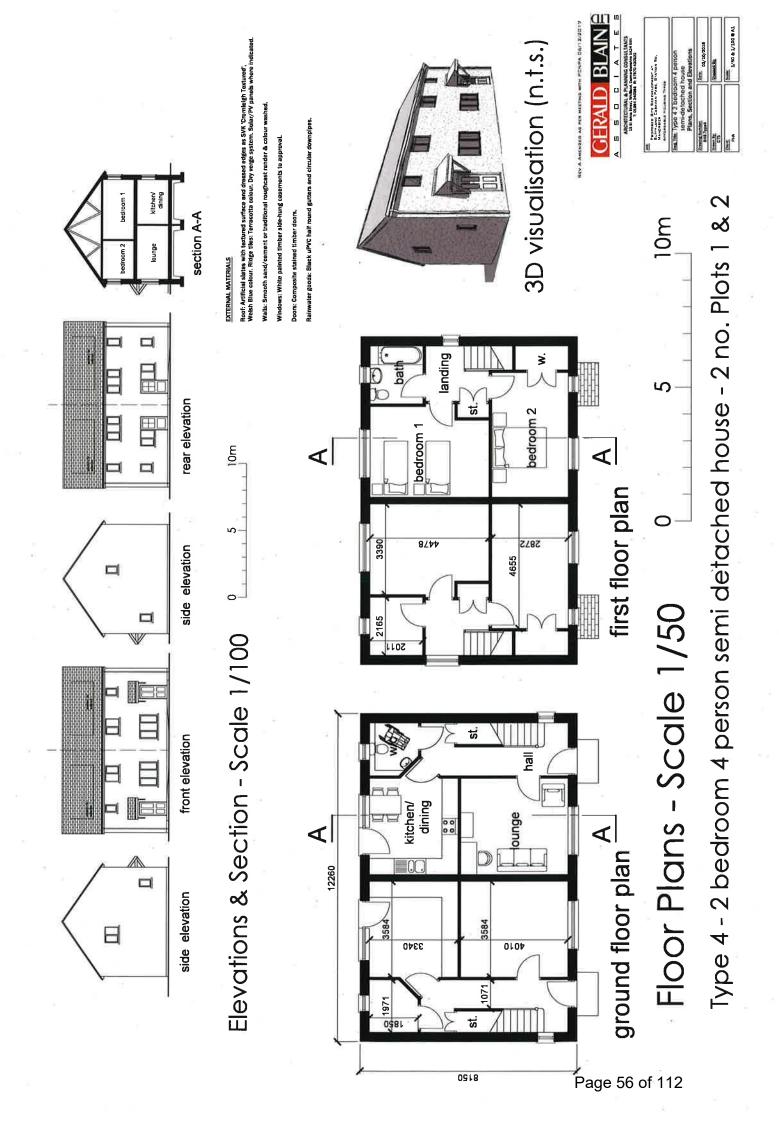


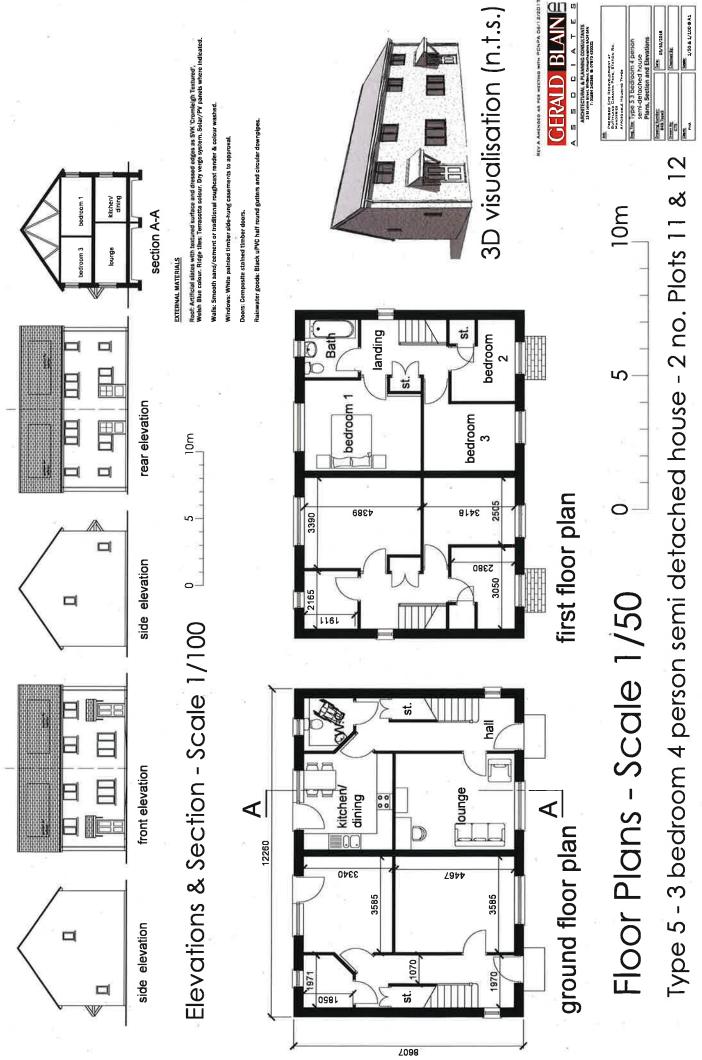




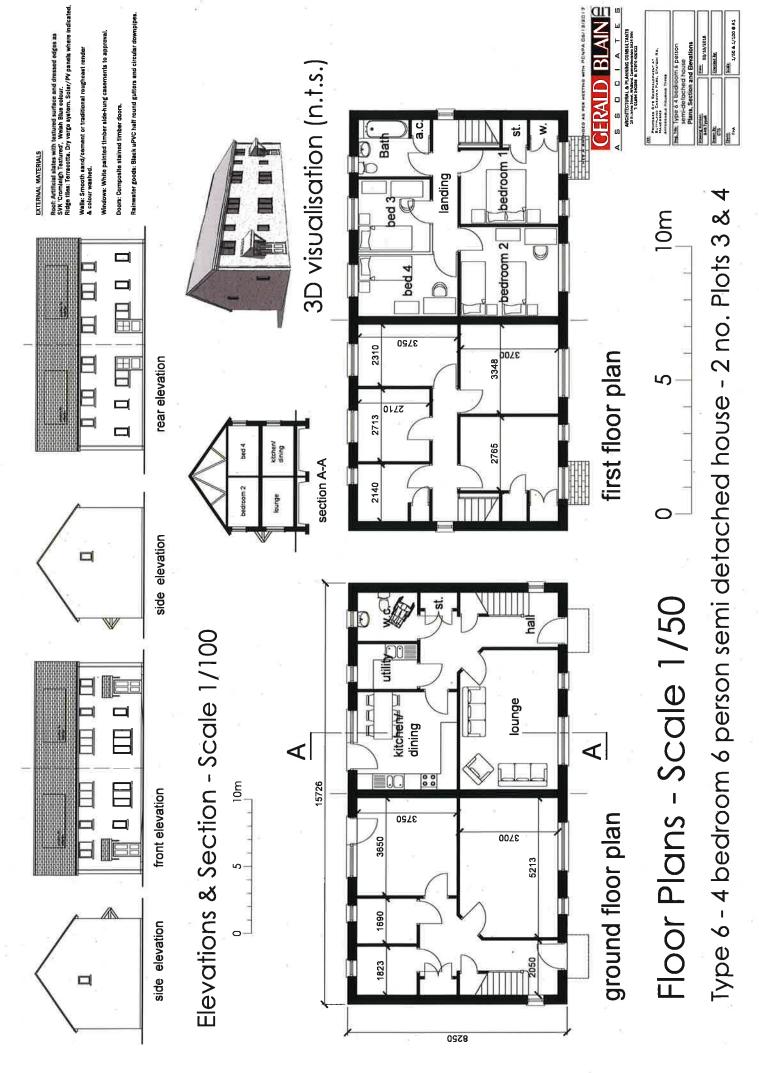


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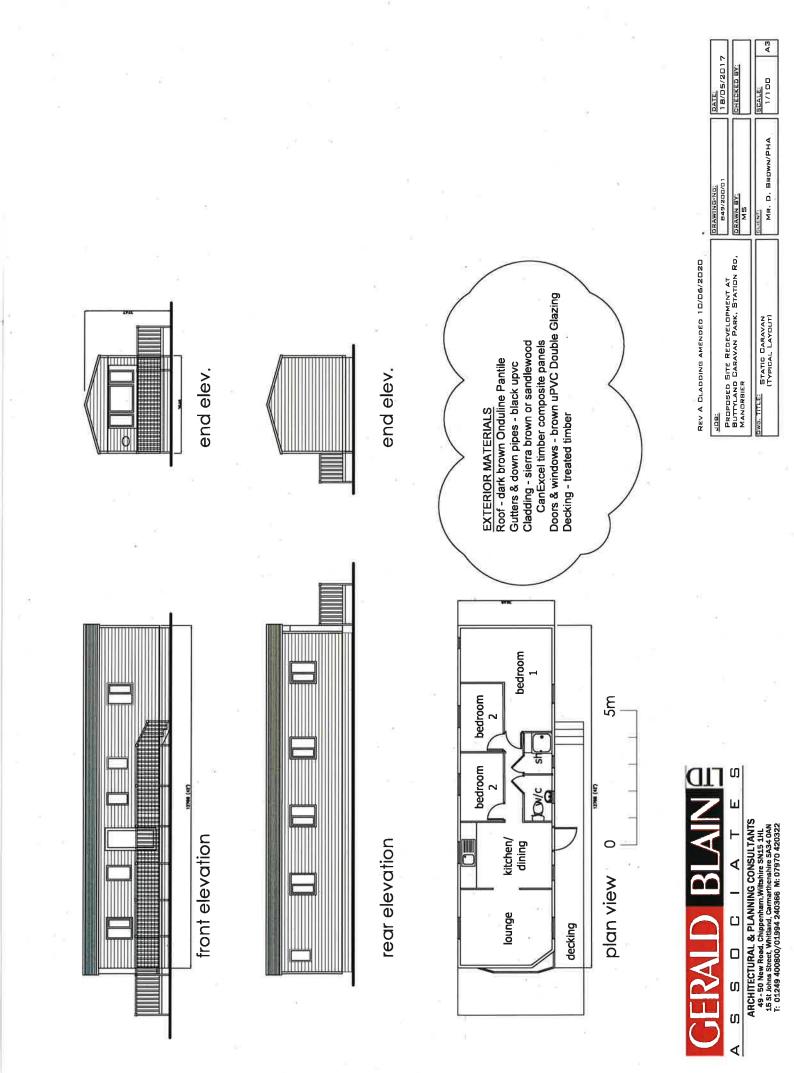
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Suggested Materials Palette Buttylands Caravan and Camping Park, Manorbier

SIERRA

SANDALWOOD

Sierra Brown Panels (CanExel Premium Cladding)

Sandalwood Green Panels (CanExel Premium Cladding)

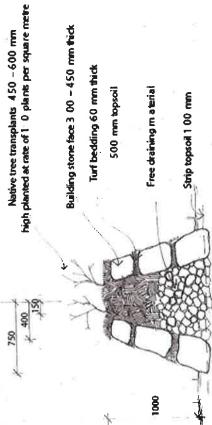
Shaded Brown Roof (Onduline Pantile Roof)

Two suitable cladding options given below. LPA to advise which is preferred:



To be read in conjunction with EDP's Proposed Landscape Strategy Drawing edp5474\_d001e where indicative species list is expanded upon.

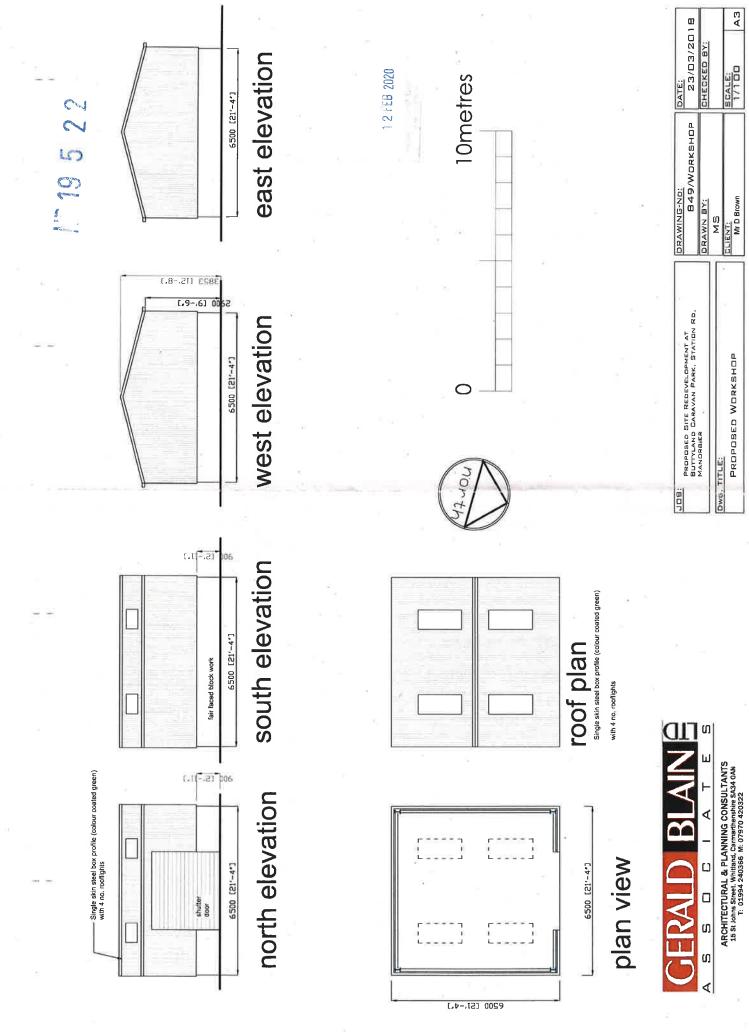
Pembrokeshire Hedgebank Detail Option 1 extract from PCNPA sketch



(Jay) BALID

Front Elevation See Drawing 849/200/01 by Gerald Blain Associates for detailed layout)

Pembrokeshire Hedgebank Detail



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