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| <b><u>Application Ref</u></b> | <b><u>NP/16/0677/FUL</u></b>                                                                                                                                                                                                                                                                                                                                                                                |                    |             |
| <b>Case Officer</b>           | Kate Attrill                                                                                                                                                                                                                                                                                                                                                                                                |                    |             |
| <b>Applicant</b>              | Bluestone National Park Resorts Ltd                                                                                                                                                                                                                                                                                                                                                                         |                    |             |
| <b>Agent</b>                  | Mr R Bowen, Asbri Planning Ltd                                                                                                                                                                                                                                                                                                                                                                              |                    |             |
| <b>Proposal</b>               | Conversion & restoration of existing Mill and ancillary buildings to provide heritage tourist facility. Construction of light narrow gauge steam railway with associated station & platform. Construction of 792sq.m all-weather events barn & associated facilities, cycle parking, car parking, site infrastructure including drainage services along with hard & soft landscaping & boundary treatments. |                    |             |
| <b>Site Location</b>          | Blackpool Mill, Blackpool Bridge, Narberth, Pembrokeshire, SA67 8BL                                                                                                                                                                                                                                                                                                                                         |                    |             |
| <b>Grid Ref</b>               | SN06711386                                                                                                                                                                                                                                                                                                                                                                                                  |                    |             |
| <b>Date Valid</b>             | 14-Dec-2016                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Target Date</b> | 12-May-2017 |

The application is referred to the Development Management Committee meeting for determination as the application is major and is of significant public interest.

#### **Site location and description**

The site lies approximately 1.2 kilometres south of the junction of the A40 with the A4075 which serves the Bluestone National Park Resort and the Oakwood Theme Park. The site is served by an unclassified road which joins an old section of the A4075 some 300 metres south of its junction with the A40 at Canaston Bridge. The site is some 800 metres to the west of this junction.

Bluestone National Park Resort has been operating since 2008, originally gaining outline planning permission in 2004 under application reference: 02/0900/PA. The Bluestone Resort stretches across two Local Planning Authorities; Pembrokeshire Coast National Park Authority and Pembrokeshire County Council. The site subject to the current proposals lies outside of the main resort, approximately 1km to the north and is wholly located within the National Park.

The application site is located immediately adjacent to the registered historic park and garden known as Slebech Park.

#### **Description of Development**

Blackpool Mill is a Grade II\* Listed building on the northern bank of the Eastern Cleddau, at Blackpool Bridge dating from 1813. The Mill was first converted to a tourist attraction in 1968, and was listed in 1971 as an exceptionally fine industrial building which survives virtually intact and includes a full working set of machinery. Currently the Mill and its ancillary buildings are standing vacant.

The application proposes a heritage tourism attraction comprising the conversion of the Grade II\* Listed Mill building to a heritage centre with retained mill machinery on display at ground level, kitchen/bakery on the ground floor east wing, toilets in the west wing, first floor east wing kitchens, mill machinery display, west wing exhibition space and storage. The second floor comprises bat mitigation in the wings, with the remaining space being given over to visitor access.

The Listed Building consent (NP/16/0678) for the physical works to the Mill was recommended for approval by Cadw by the Development Management Committee on the 22<sup>nd</sup> March 2017. As the Mill is Grade II\* listed, the consent has to be issued by Cadw.

The two ancillary listed buildings are also proposed to be converted. The store house will become an engine shed whilst the miller's cottage is proposed to be converted into a Fish & Chip Restaurant.

The application proposes further ancillary development located on Blackpool Meadow to the west of the Mill building which is justified as being required to underpin the viability of the works to the Mill itself.

#### Railway and platforms

The proposals include the development of an element of 'enabling development' on land adjoining the listed Blackpool Mill. The proposals include construction of a light narrow-gauge steam railway track in the form of a loop sited to the south-east of the listed mill, with two platforms:

- (1) a new single-storey station building positioned close to the road and adjacent to the current field access - the station building has been described as being modelled on the Welshpool to Llandair Station and
- (2) another platform adjacent to the engine shed.

Part of the rail track will run around the meadow and part will be located within the existing woodland.

Two different cross sections have been provided of the engineering required to facilitate the track, one of which shows sleepers over a granite/limestone layer over a compacted hardcore base, and one which shows tarmac block paving with a concrete base. There is no submitted plan showing where the differing bases are to be located.

#### Events Barn

It is also proposed to site a substantial new building measuring 36.2 metres by 21.6 metres which is described as being of an agricultural vernacular design featuring a double barrel vaulted roof which is 6 metres high with a footprint of 792 square metres.

The events barn is shown to include an area for secure storage of the train, a kitchen and toilet block with gas tanks located adjacent to a sewage treatment plant (STP). No detail as to whether the STP is above or below ground have been received but it is described as being surrounded by a timber fence. The footprint of the Mill building is 235 square metres.

The 'events' building is described as being necessary for hosting exhibitions and events and in order to house visitors during wet weather as the Mill has been assessed as capable of taking 50 visitors per floor. Further information was requested after the initial Committee site visit to clarify the intended use of the barn. Further information received since details a potential calendar of events to include:

January – Charles Dickens celebration – 4 performances a day of “Oliver”

February – February Fashion week – fashion displays

March – Welsh Heritage Celebrations, choirs, music and dancing, model railway exhibition, steam tractor engines, toys, models

April – Easter egg trail – petting zoo, lambs and rabbits

May – May day festival – may pole dancing – Morris dancing, clog dancing, lawn games, tennis, bowls, quoits, Craft fair selling locally made crafts

June – Victorian extravaganza, steam machinery, transport, music, parades, magicians, side shows, freak shows

July – Summer festival – Victorian games and toys exhibits, no fit state circus performances and skills workshops, vintage carousel

August – Agricultural show, vintage farm machinery, cars, steam engines, falconry, heavy horses, carriage rides, chainsaw carving, lamb petting barn, local retailers in the barn

September – Harvest festival, hayrides, vintage tractors, mini tractor driving course

October – Monsters at the Mills, monsters ball, children's parties, games, dancing, mask making, pumpkin carving, ghost stories (in the Mill). Mining exhibition with Saundersfoot and District Historical Society

November/December – Traditional Victoria Christmas, Santa's Grotto, little donkey rides, carols and music, Christmas market. Entertainments team performance 2-4 times per day, 'Twas the Night before Christmas'.

The events building is proposed to be of profile-steel sheet roof and larch boarded walls in the submitted planning statement, but zinc clad walls are shown on the proposed plans.

The application also includes the development of a substantial car park on the opposite side of the road. The car park will accommodate 150 vehicles and will require the removal of a number of existing trees on site.

A network of footpaths are also proposed around the meadow, and a scheme of lighting is proposed within the Mill site, the meadow and the car park.

### Boundary Treatments

The documents originally submitted indicated a chain link fence 1.8 m high to run along the north eastern boundary alongside the public right of way, with a metal railing of 'herras pro' fencing to 1.8m high to the frontage of the site, and a 2m high deer fence to the western, and south western boundary. The applicants have since acknowledged these are insensitive treatments and indicated a likely revision to these details, but they had not been received at the time of writing the report. The treatment of boundaries could be conditioned.

### Environmental Assessment

A formal request for a Screening Opinion on the requirement for an Environmental Impact Assessment was not received by the Authority neither was a scoping opinion request. However, the applicant has elected to submit an Environmental Statement with the application. An addendum to the original ES has also since been received in respect of the accompanying statement.

### The "Sandford Principle"

To assist National Park Authorities make decisions between conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as the 'Sandford Principle', named after Lord Sandford who was chair of the committee.

The Sandford Principle states that:-

"Where irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority"

This principle is also expressed in the Authority's duty under the Environment Act 1995, as follows;

"If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area".

This application proposes a high level of enabling development set directly adjacent to the Grade II\* listed Mill building, and the determination will require careful judgement as to whether the proposed level of development is appropriate in this tranquil and sensitive setting.

### **Sustainable Development**

The Planning (Wales) Act 2015 requires the Authority in determining and application for planning permission to exercise its functions, as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015, for the purpose of ensuring that the

development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales and must take into account guidance issued by the Ministers (section 2).

The assessments contained in this report have been undertaken in accordance with this duty.

### Consultee Response

**PCNPA - Buildings Conservation Officer:** Objecting

**British Horse Society - South West Wales:** Objecting

**Llawhaden Community Council:** Objecting - Llawhaden Community Council have expressed concerns relating to:

The road being unsuitable for extra traffic

The impact on the public right of way in front of the Mill [the Permissive path]

The idea of a steam train in this area would absolutely destroy the tranquillity

Pedestrians, dog walkers, cyclists and people with small children would be put at great risk walking along this road with the excess traffic

Local habitat would be affected

A Victorian Fish & Chip shop does not suit this development

Local residents are requesting that much careful consideration should be given to this application as tourists travel back home and local people appreciate this area all year round.

**SPAB:** Concern - expressed over setting of Listed Building.

**PCNPA - Ecologist:** Concern - Significant concerns regarding the potential impact of the proposed development on European Protected Species and European Designated site. Does not consider that the development currently accords with policies 10 or 11 of the LDP, TAN5 or PPW.

Second response received 14th March 2017 - Objection - The application will need to be screened to determine likely impact on bats etc. To do this further information is required. This must be done before the application is determined.

Further response dated 5th April 2017 - Further information still required

**West Wales Maritime Heritage:** Supporting

**Dwr Cymru Welsh Water:** Advise that the applicant contacts NRW. Should circumstances change and a connection to the public sewerage system/public sewerage treatment works is preferred please re-consult.

**Martletwy Community Council:** The Community Council support the application but have concerns.

**PCNPA - Tree and Landscape Officer** There would be no objection to this proposed development in relation to the trees and landscape features on and immediately adjacent to the site if all work is carried out in accordance with the documents listed in my response and following clarification of the following points:

Further information required:

Parking area landscaping proposals

Fencing implementation location, type and methodology

Landscaping species selection

**PCNPA - Park Direction:** It is considered that this proposal would be contrary to several policies of the Local Development Plan and the introduction of the

railway and associated development at this location would have a significantly negative impact on the National Park.

Further comments received - 26 January 2017.

**PCC - Drainage Engineers:** Advice should be sought from Natural Resources Wales with regard to flood risk for this development.

The applicant should be made aware that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without prior written consent of Pembrokeshire County Council under Section 23 Land Drainage Act 1991. Consent is required for temporary as well as permanent works

**PCC - Access Officer:** The proposal demonstrates a good level of accessibility in some areas but other parts require further consideration in order to be fully accessible.

**Natural Resources Wales:** Conditional Consent

**Dyfed Archaeological Trust:** Conditional Consent

**CADW - Protection & Policy:** No adverse comments

**PCNPA - Access Manager:** No adverse comments

**PCC - Transportation & Environment:** Recommend Refusal

**Friends of Pembrokeshire National Park:** Recommend Refusal

### Public Response

The application was advertised in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, by letter, press advertisement and by site notice.

As the development is a 'major' development, the applicants also conducted a pre-application consultation (PAC) with the local community for which a PAC consultation report was also submitted with the application. No changes were made to the application as a result of the pre-application public consultation.

28 letters of support have been received to date on the basis of:

- Increased jobs
- Supporting tourism
- The café being available again
- The restoration of the Mill
- Provision of a community facility

16 letters of support from contractors associated with Bluestone have been received

14 letters of objection have been received citing the following concerns:

- Increased traffic on the narrow lane
- The creation of an industrial complex
- That the development will only benefit tourists and not locals
- The whole Mill and meadow being fenced off
- Disturbance to the tranquility of the area
- Impacts and displacement on wildlife
- Litter generated by fast food restaurants polluting the Cleddau
- Loss of habitat through creation of a huge car park
- Urbanisation of the countryside

- The railway will not enhance the landscape in any way
- Light pollution
- Poor quality of jobs created
- Overdevelopment

### **Policies considered**

Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website -

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

Circular 60/96 - Planning and the Historic Environment: Archaeology  
 Circular 61/96 - Conservation Areas  
 LDP Policy 01 - National Park Purposes and Duty  
 LDP Policy 07 - Countryside  
 LDP Policy 08 - Special Qualities  
 LDP Policy 09 - Light Pollution  
 LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest  
 LDP Policy 11 - Protection of Biodiversity  
 LDP Policy 12 - Welsh Language  
 LDP Policy 13 - Historic Landscapes Parks and Gardens  
 LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park  
 LDP Policy 29 - Sustainable Design  
 LDP Policy 30 - Amenity  
 LDP Policy 32 - Surface Water Drainage  
 LDP Policy 34 - Flooding and Coastal Inundation  
 LDP Policy 35 - Visitor Economy  
 LDP Policy 48 - Community Facilities and Infrastructure Requirements  
 LDP Policy 52 - Sustainable Transport  
 LDP Policy 53 - Impacts on traffic  
 LDP Policy 54 - Cycleways  
 PPW9 Chapter 04 - Planning for Sustainability  
 PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast  
 PPW9 Chapter 06 - Conserving the Historic Environment  
 PPW9 Chapter 07 - Economic Development  
 PPW9 Chapter 08 - Transport  
 PPW9 Chapter 11 - Tourism, Sport and Recreation  
 SPG06 - Landscape  
 SPG12 - Parking  
 SPG19 - Siting and Design of New Farm Buildings  
 SPG23 - Enabling Sustainable Development in Welsh NPAs  
 TAN 12 - Design  
 TAN 13 - Tourism  
 TAN 15 - Development and Flood Risk  
 TAN 18 - Transport  
 TAN 22 - Planning for Sustainable Buildings  
 TAN 23 - Economic Development

**Constraints**

Ancient and Semi Natural Woodland - within 25m  
Special Area of Conservation - within 500m  
Site of Special Scientific Interest - within 50m  
Technical Advice Note 15  
Contaminated Land  
LDP Mineral Safeguard  
Biodiversity Issue  
Rights of Way Inland - within 50m  
NPA Foreshore - within 25m  
Potential for surface water flooding  
Recreation Character Areas  
CADW Registered Gardens - within 25m  
Landscape Character Assessment  
Seascape Character Assessment

**Officer's Appraisal****Background**

A request for pre-application (PA/15/0427) advice was received in November 2015 which gave sketch plans showing a large circular 'circus' style building in the meadow described as a 'festival' building with car parking immediately adjacent accessed from the existing Meadow field gate and a circular steam train route which ran along the bank of the Cleddau. At this point, no plans or details for the Mill itself were received although the description was 'restoration of Mill and surrounding area'.

Your officers expressed serious concerns as to the principle of a steam train, the proximity of development to the river, and the size of the building.

A further pre-application concept plan (PA/16/0074) was received in March 2016 revising the proposal to remove the train from the banks of the river, and removing the car parking from the Meadow area, but did not identify the new car parking location as proposed.

The Authority's Planning Ecologist emphasised the need for comprehensive surveys and the requirement to screen the application under the Habitats Regulations Act due to the proximity of SSSI and SAC's. The Authority's response stated that 'the proposals as submitted are unlikely to be supported as the most appropriate method of safeguarding the future preservation of the Mill and its setting within the National Park'.

During the processing of this application alternative, less intrusive, schemes have been suggested by the National Park. However the developer has not amended the scheme to reflect the suggested alternatives.

**Key Issues**

The application raises the following planning matters:

- Policy and Principle of Development



- Siting, Design and Impact upon the Special Qualities of the National Park
- Lighting
- Impact on setting of Listed Buildings
- Ecology
- Highways
- Rights of Way
- Economic Benefits
- Flooding
- Community Benefit

### **Policy and Principle of Development:**

Policy 35 of the Local Development Plan allows for visitor attractions in identified Centres in the Plan. It is also recognised in the policy that in some instances attractions are based on features or structures which are already in situ in countryside locations and allows for such developments where the need for the attraction to be in that particular location can be justified. Blackpool Mill clearly falls into this category, being a Listed Building on the banks of the Cleddau Ddu.

The remaining elements of the proposal are essentially introduced into the area, ostensibly using historic linkages to create a 'Victorian' themed attraction. It is clear, however that there has never been a historic railway associated with the Mill in this location and that the main mode of transport would have been the Cleddau waterway itself. It is suggested that the construction of a railway, barn and other associated developments are being promoted as a means of protecting the Grade II\* Listed Blackpool Mill, however the suggested links between the two are tenuous and potentially harmful to both the setting of the Listed Building and to the Special Qualities of the National Park.

This area is one of the most tranquil areas of the National Park, characterised by its undeveloped landscape contained by the calm and quiet water of the upper Daugleddau Estuary. The tranquility of both the landscape and the water here are a stark contrast to much of the rest of the National Park which is more readily accessible to residents and visitors and to the energy of the sea around the open coast. A recent survey undertaken by the National Park Authority shows that 66% of those using the footpaths in this area are local people. It is clearly an important resource for the local population..

The links to a railway at this location made in the application are somewhat unconvincing, relating to the wider history of Wales than this particular locality. References are made to Snowdonia and Merthyr Tydfil (close to Brecon Beacons National Park) where railways were the historic mode of transport and where historic railway lines exist.

The introduction of a circular railway at Blackpool Mill is accordingly considered to be little more than the creation of a theme park attraction without any real connection to the history of the locality. Although references

to a railed track being laid for a sawmill between 1914 and 1917 have been submitted in an addendum to the Planning Statement from extracts of a memoir of a Miller from Blackpool Mill, this relates only to a single track not associated with the original development Mill, and located further to the west than the proposed circular loop. Thus the necessity for the railway to be developed at this location is not justifiable in terms of Policy 35. The protected landscape of the undeveloped National Park and in particular this tranquil location is not considered to be an appropriate location for an attraction which does not rely on any particular features within that landscape to be located there.

Furthermore, the Authority's Supplementary Planning Guidance on Landscape Character identifies this area within the Milford Haven Waterway Historic Landscape as being unique in the National Park with a great sense of tranquillity, enclosure and shelter.

Management guidance for the area highlights a need to conserve the unspoilt estuarine character and to ensure that developments respect the historical significance of the area which is linked to well-cared for woodland, parkland and long-established private estates with a history of small-scale coal mining, historic agricultural landscapes, landed houses and distinctive field patterns. Recreational pursuits should be allowed but monitored to minimise disturbance and ensure long-term survival of the estuarine habitats and associated species.

The introduction of the new build elements of this proposal have significant potential to increase noise in this tranquil location. The proposal is also served by an extensive car park. The proposed increase in visitors would have a significant impact on the tranquillity of the locality.

Lighting would also impact on the area. Policy 30 of the Local Development Plan restricts development which leads to an increase in traffic, noise or light.

Policy 8 of the Plan seeks to protect the special qualities of the National Park and in particular that the sense of remoteness and tranquillity is not lost and is wherever possible enhanced.

The cumulative impact of this proposed development along with Bluestone's other attractions and accommodation also needs to be taken into account.

It is considered that this proposal would be contrary to several policies of the Local Development Plan and the introduction of the railway and associated development at this location would have significantly negative impact on the National Park. The principle of the proposal is accordingly not approved.

#### ***Impact of the proposal on the Special Qualities of the National Park***

Policies 8 and 15 of the Local Development Plan seek to protect and enhance the special qualities of the National Park.

Policy 8 lists 9 priorities, the most relevant to this application being a) to ensure that the sense of remoteness and tranquillity is not lost and wherever possible enhanced; d) to ensure that the historic environment is protected and where possible enhanced; e) that development restores or wherever possible enhances the national Park's ecosystem, and g) to ensure that local biodiversity action plan species and habitats are protected for their amenity, landscape and biodiversity value.

In addition, Policy 15 seeks to prevent development that causes significant visual intrusion, is insensitively and unsympathetically located within the landscape, introduces / intensifies a use that is inappropriate to its location, that fails to harmonise with the landscape character of the National Park, and that loses or fails to incorporate important traditional features.

The application site falls within Landscape Character Area 28 – Daugleddau, as defined in the Authority's Supplementary Planning Guidance on Landscape Character Assessment. The SPG describes this area as follows:-

**'Special Qualities (Key Landscape Characteristics)**

This large LCA is unique in the National Park in that it is physically detached from the remaining areas of the Park by some distance. There is no sense of being close to the sea, except for the movement of the tides, and the smell of salt on the air and occasional lumps of seaweed on the strand line. There is a great sense of tranquillity here, produced by the enclosed large water body, whether at high or low tide, and the feeling of being on a quiet backwater. A strong sense of enclosure and shelter is provided by the surrounding landform, dense stands of woodland and belts of trees. There are framed views at intervals along shoreline roads and paths. The water body has a major unifying influence on the scene, whether at high or low tide. There is a prevailing sense of a sheltered, well cared-for wooded farmland and parkland landscape of long-established private estates and secluded houses, contrasting with the more open shoreline villages and hamlets with views along the branches of the estuary. This is a landscape of outstanding historical significance within Wales. This area includes traces of the county's small-scale coal mining industry as well as historic agricultural landscapes, including landed houses, farms and cottages set in distinctive field patterns. The Milford Haven Waterway Registered Landscape of Outstanding Historical Interest in Wales encompasses virtually all of this LCA. This river valley and estuary landscape has an unsurpassed concentration of remains, reflecting maritime conquest settlement, commerce, fishing, defence and industry spanning the prehistoric to modern periods.'

The application states that it is anticipated to have up to 1000 visitors per day, the development would significantly intensify the use of this area with the introduction of features more akin to a theme park and would have a harmful impact on the tranquillity and sense of remoteness of the area. The proposed development is therefore, considered to be contrary to LDP Policies 8 and 15 and Supplementary Planning Guidance. The application site is noted for its

sense of tranquillity, which is unique within the National Park. Strategic Policy 8 of the LDP specifically refers to tranquillity wherever possible being enhanced. Whilst the National Park does not have SPG relating directly to tranquillity the Landscape Institute produced a Technical Information (01/2017) Note in respect of tranquillity in 2017 which provides some context. Of particular relevant are the following extracts:-

'2.6 In Wales, the definition of tranquility that has been adopted by both Welsh Government (Welsh Government 2012) and Natural Resources Wales (NRW 2016a) is "An untroubled state, which is peaceful, calm and free from unwanted disturbances. This can refer to a state of mind or a particular environment. Tranquility can be measured in terms of the absence of unwanted intrusions, or by a balancing of positive and negative factors. These include the presence of nature, feeling safe, visually pleasing surroundings and a relaxing atmosphere.

3.17 Similarly when asked "What is not tranquility?", there was a degree of consistency in the detractors that were listed as follows: ☐ Presence of humans/too many people - Certain behaviour/activities undertaken by people which created unwanted noise and disturbance. ☐ Negative impacts of various forms of transport including vehicle noise. ☐ Negative impact of various forms of development including commercial and industrial development.

3.21 The Evaluation Framework for Natural Beauty contained in Appendix 1 of the Guidance details the sub-factors and associated indicators that should be regarded in the assessment process and includes the following under 'Relative Tranquility': ☐ Contributors to Tranquility – Presence and/or perceptions of natural landscape, birdsong, peace and quiet, natural-looking woodland, stars at night, stream, sea, natural sounds and similar influences ☐ Detractors from Tranquility – Presence and/or perceptions of traffic noise, large numbers of people, urban development, overhead light pollution, low flying aircraft, power lines and similar influences.'

The proposed development with the associated noise and activity from the anticipated level of visitors, vehicle movements and steam train will have an adverse impact on the tranquility of the area to the detriment of the special qualities of the National Park, which are enjoyed by a various receptors including walkers, cyclists and horse riders.

### Lighting

Policy 9 of the LDP advises that proposals that are likely to result in a significant level of lighting shall include a full lighting scheme and will be permitted where the light proposed relates to its purpose and where there is not a significant adverse effect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky.

The application was originally submitted with a lighting scheme which was considered to be detrimental to the character of the Listed Buildings, ecological interests and concerns were expressed by Martletwy Community Council as to the potential for the opening hours to be extended (and

consequently lighting later in the later evening) which would have a negative impact on local residents and wildlife.

A revised lighting scheme has been submitted which reduced the visual impact, but were the application to be approved, a condition would be required to agree lighting and hours of operation to ensure control over this element of the scheme.

### **Impact of Proposals on the Setting of Listed Buildings**

The application site comprises a Grade II\* listed Mill building and ancillary buildings and the Grade II\* listed Blackpool bridge is located immediately adjacent to the site. A Grade II listed building is also located within close proximity at High Toch Farmhouse, as such, PCNPA Buildings and Conservation officer was consulted on the application to assess the impact of the development on the listed buildings. The consultation response received is as follows:-

#### **1. Introduction**

The listed buildings at Blackpool comprise the Mill itself, and Blackpool Bridge, both listed Grade II\*. Both the former store and cottage/smithy – proposed for conversion – fall within the historic curtilage and are therefore also listed. Other curtilage structures of note include the stone-lined leat, the leat bridge, the retaining wall forming the eastern boundary, and the remains of the limekiln. High Toch, a Grade II listed farmhouse lies some 700 metres to the north-west and is visible from the site. The public right of way leading from the Mill to Slebech Park forms a linear part of the Slebech Park registered Park/Garden.

#### **2. History in summary:-**

- Blackpool mentioned 1555; river, ford and weir valuable for fishing
- 1760 (perhaps earlier) - 1806 – charcoal-fuelled iron forge set up on site. Leat and at least one outbuilding (to south-west of mill) date from this phase.
- 1790s – timber wharf operated by Nathaniel Phillips
- 1813-22. Corn mill and bridge built for Nathaniel Phillips. East drive to Slebech Hall laid out.
- 1901-15. Mill re-mechanised, turbine fitted. Pike family (millers) specialise in grinding wheat and also set a steam-powered sawmill next to the mill. Stabling and smithy used for horses hauling timber from woods; timber wharf built to help war effort.
- 1954. Mill closed, electricity installed
- 1968. Mill converted to tourist attraction including shop and tea-room.

#### **3. An assessment of the site**

Blackpool Mill was apparently built for Nathaniel Phillips of Slebech Park, prior to his death in 1813. The designer was the engineer, George Brown

of Amroth, who was also responsible for the mill at Pembroke, and possibly that at Carew. All three had a main block of four storeys and five bays, Blackpool being unique in having two-bay wings, resulting in an unusually imposing and symmetrical façade. The bridge adjacent is probably contemporary with the mill, described as 'new' on J. Goode's plan of 1822.

The mill was worked via a leat off the Eastern Cleddau, which extends to the north-east. The leat runs via a stone-lined culvert central to the mill, across a deep lawned forecourt, this adding to the formality of the whole group. The mill-wheel and machinery were replaced by the surviving turbine-driven machinery in 1901, by J.J. Armfield of Ringwood, Hants.

Two single-storey ancillary buildings are located to the south and south-west, the whole group within a fine rural and riverside setting, and set behind a large green bisected by the mill-leat. The roofs of both buildings have been altered.

The single-storey building south-west of the mill appears to be of earlier date than the mill, presumably also associated with the forge. The other building is dated 1830, originally a cottage and smithy, but based on a building existing in 1822. By the early C19, a limekiln had been built to the south-west of the mill, this now a ruin.

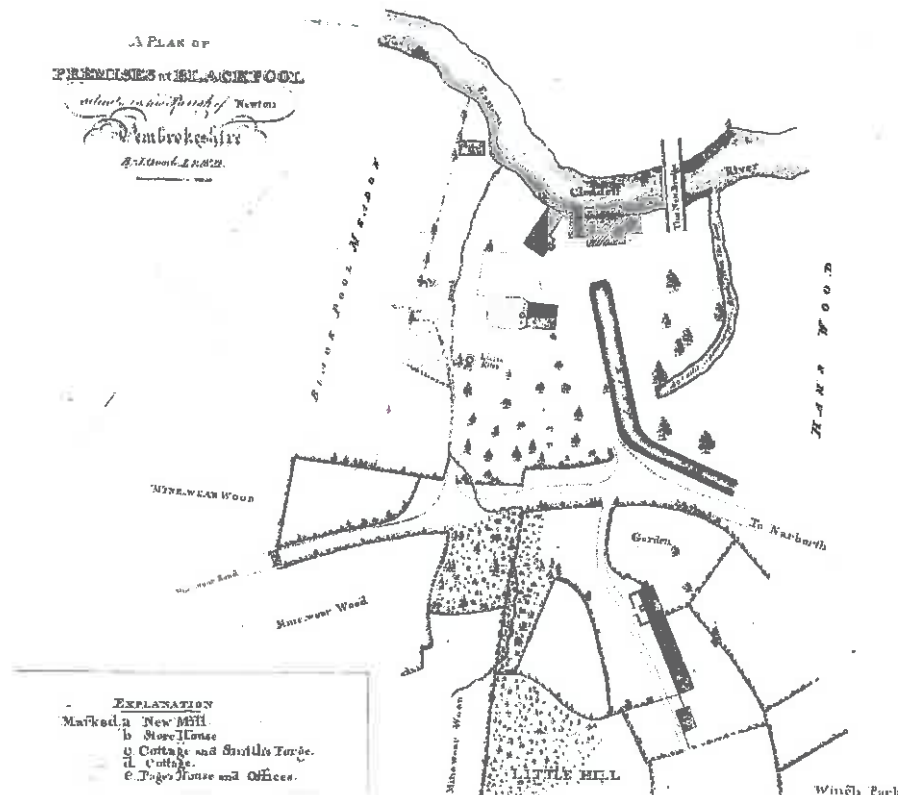


Figure 1 - estate map of Blackpool Mill 1822

The history of Slebech estate provides a context for the post-1800 buildings at Blackpool. Slebech Hall was rebuilt 1773-6 in a castellated 'picturesque' style, early for its date. Improvements to the parkland followed in the early C19, including the east drive, which formed a picturesque carriageway over Blackpool Bridge, running west towards the Hall. This must account for the rather formal character of the mill and the expensively dressed masonry of the bridge. As well as providing a local amenity (the high prices of corn being beneficial to landowners after the introduction of the corn-laws in 1815), the mill and bridge were clearly intended to ornament the outer environs of Slebech Park, very much in the 'picturesque' taste.

The natural features were an important part of the historic setting – the Eastern Cleddau obviously so, but it is interesting to note that the tree cover within the vicinity of the mill is little-changed from that shown on the Slebech Tithe Map of 1847.



Figure 2 - Extract from Slebech Tithe Map - 1847

The meadow to the south-west of the mill (site of proposed railway and events building) is an attractive open space, described as 'Black Pool Meadow' on the estate map of 1822.

#### 4. Cadw's Conservation Principles

*Cadw's Conservation Principles for the sustainable management of the historic environment in Wales (2012) are set out as follows:-*

*Principle 1 – Historic Assets will be managed to sustain their values*

*Principle 2 – Understanding the significance of historic assets is vital*

*Principle 3 – The historic environment is a shared resource*

*Principle 4 – Everyone will be able to participate in sustaining the historic environment*

*Principle 5 – Decisions about change must be reasonable, transparent and consistent*

*Principle 6 – Documenting and learning from decisions is essential*

The Principles establish values which should be attached to heritage assets, namely evidential, historical, aesthetic and communal.

**4.2 Evidential Values.** The site demonstrates well elements of past human activity, with buildings spanning the use of the site as an iron forge and then an estate mill, c. 1760-1830. There is an overlay of early C19 estate improvement, the mill and bridge being key features of the eastern drive to Slebech Hall, the juxtaposition of buildings and landscape in the spirit of contemporary 'picturesque' taste, as recognized by the designation of the historic park/garden adjacent.

**4.3 Historical Values.** The association of the site is with Slebech estate and its documented various owners. From the later C18, the house and immediate gardens were improved by John Symonds, then (1793-1813) Nathaniel Phillips, slave trader and sugar plantation owner, and after 1830, Baron C.F. de Rutzen, who energetically expanded and improved the estate (prominent legacies including Slebech Church and the former de Rutzen Arms, Narberth).

**4.4 Aesthetic Values.** As suggested above, the buildings were intended as more than utilitarian in nature. The mill and bridge were part of the 'picturesque' estate improvements of the owners of Slebech estate, always intended to be 'read' within the existing natural surroundings – which remain remarkably unaltered since the early C19

**4.5 Communal Values.** Blackpool Mill will hold some local associations as a former working mill, also a destination for pleasure boat trips on spring tides. For most, the association will be the former tourist attraction (with shop and tea room) and as a popular place to be explored via the surrounding public and permissive paths





Figure 3 - extract from 1887 O.S. Map

## 5 Issues under consideration

### 5.1 These include:-

- Light narrow-gauge railway and associated station and platform
- All-weather events barn
- Car Park
- Conversion of existing outbuildings
- Hard and soft landscaping
- Lighting
- Land train route

## 6. The setting of listed buildings

The setting of a listed building is a material planning consideration, as set out in section 66 of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990.

Paragraph 69 of Welsh Office Circular 61/96 states that *applicants must provide the local planning authority with full information to enable them to assess the likely impact of their proposals on the special architectural or historic interest of the building, and on its setting.*

There is currently no definition of a setting of a listed building in any formal guidance, but the emerging Welsh Government guidance in the form of Draft Technical Advice Note 24: The Historic Environment and its draft annexes, including 6 (Setting of Historic Assets in Wales), which has been subject to consultation, provides a very useful guide.

'The setting of a listed building is the surroundings in which it is understood, experienced and appreciated, embracing present and past

relationships to the surrounding landscape. Views to, from and across a historic asset are an obvious form of evaluation, but other sensory elements may be relevant too, including topography, layout, use, noise, and light pollution, as well as historic, artistic, literary, cultural or scenic associations, tranquillity and remoteness.'

The relevant buildings include the mill and its curtilage structures and Blackpool Bridge, all Grade II\* listed. In addition, the setting of High Toch Farmhouse (Grade II listed), some 750 metres to the north-west is relevant. This section considers each element of the setting, as follows:

1. **Views to, from and across the historic asset/ prominence of the historic asset in views throughout the surrounding area.** Views towards/across the mill in relation to the proposal are outlined in Appendix 10 of the Environmental Statement (December 2016). These include (as labelled within the appendix):-
  - **VP1/VP1A.** Views from the lane across the open meadow to the south-west of the mill (the meadow described as such on the 1822 estate map). These show glimpses of the mill and the smithy/cottage through the trees (TPO 9) of the eastern boundary, with the tree-clad bank of the Eastern Cleddau forming a backdrop. This is an attractive and verdant scene. *The proposed development within the meadow (railway, events building) will inevitably dominate the scene from an attractive public viewpoint, to the extent of rendering the mill complex as invisible and lacking context. The proposed boundary fencing (deer/metal fencing @ 1.8-2 metres) will be highly intrusive and incongruous within such an open rural setting.*
  - **VP2.** Views across the mill 'forecourt' from the lane. This is the 'intended' public view of the mill, providing its 'showpiece' symmetrical façade with the fine bridge adjacent. The belt of trees to the west (TPO 9) effectively screens the proposed development within the meadow. *The restored buildings will cumulatively improve the setting of each of the listed buildings. The proposed 1.8 metre metal chain-mesh/railed fences along the road and footpath boundary is wholly at odds with the setting of the listed buildings, providing an alien and forbidding sense of enclosure. [Note: The applicant has indicated that the style of fencing will be altered, however, no details have been submitted to date – and these details could be conditioned should planning permission be forthcoming].*
  - **VP4.** Views downriver from Blackpool Bridge. This was clearly part of the picturesque historic route to Slebech Hall, with fine vistas from each side of the bridge. The northern portion of the meadow is visible from the bridge, and will allow views of the railway itself, with the platform, station and events building remaining out of view. *Whilst the proposed development of the meadow will remain largely out of view, the railway when in use, will have a rather obvious impact.*



Figure 4 - view over Blackpool Meadow from Blackpool Bridge

- **VP6.** Views across the river from the north/north-west from the public path/former driveway. There are occasional views of the mill complex and the meadow through the belt of trees between path and river. *From here, the impact of the proposed development will be high, with railway, station, platform and events building all prominent.*



Figure 5 – view of Blackpool Mill and Meadow from north of Eastern Cleddau

Views from the mill itself will include oblique views south-westwards over the meadow (from the upper floors) which will show most of the development, with part of the events building hidden by the trees, the station probably wholly so. There will be views of the development from the proposed engine shed, into which the tracks are proposed to run, whilst there will be diagonal views across the meadow from the proposed cafe.

*Impact – HIGH*

- **HIGH TOCH FARMHOUSE.** This is prominently visible from the meadow, on the skyline. The slate-hung façade of the early C19 Grade II listed farmhouse faces south directly towards the meadow, and clearly the meadow is readily visible from the principal rooms of the farmhouse. *Both views towards and from High Toch Farmhouse will be affected by the proposed development. The setting is deeply rural, a typical mixture of pasture and woodland. The whole setting of mill and farmstead form part of the early C19 estate improvement of the Slebech Estate within which the proposed railway infrastructure and events building would be alien and intrusive.*

*Impact - HIGH*



Figure 6 - High Toch Farmhouse - visible to centre of tree-line

- **PROPOSED STEAM TRAIN AND INFRASTRUCTURE.** It is noted that screen-planting is proposed for the eastern boundary of the meadow, which will serve to shield short-range views between the mill and steam railway. However the 'Blackpool Mill Platform' lies within the immediate setting of the mill complex and despite being a low-level structure, would be highly visible when in use (people, signage, bins etc). The adjacent track forms part of the circular route, with a 'siding' off to the engine house. *This all introduces the railway operation within the immediate curtilage of the mill*

- *Impact - HIGH*

2. **Topographical features which influenced location/formal or planned vistas.** The choice of site for both forge and mill were evidently dictated by the need for a source of water, here usefully navigable on high tides. This will remain obviously apparent. It is clear that the mill and adjacent bridge were also intended to 'ornament' the eastern drive of Slebech Hall, which led from the present Eagle Lodge through Canaston Wood, across the Eastern Cleddau and then west to the Hall. *The immediate relationships between the listed buildings and their riverside will remain unaltered, as will that between mill and the 'planned' carriageway of the early C19.*

*Impact - LOW*

3. **The original layout of the historic asset and how this has changed.** The layout of the listed buildings will remain unaltered (as it has since 1813), as will the interior of the mill, which was refitted in 1901. *Minor modifications will be made in terms of improving internal circulation and reusing redundant spaces, avoiding impact on historic fixtures/fabric and being reversible*

*Impact - LOW*

4. **Functional and physical relationships with other structures/historic assets and how these have changed over time.** In this respect, the two phases of ironworks and milling are important. The proposed café is quite probably a survival of the ironworks era (see site assessment above), reused as a store for the new mill of 1813 (as evidenced by the estate map of 1822). The proposed engine shed could also be (in part) of the ironworks phase, noted as a smithy and cottage in 1830. *The proposed development retains this historic relationship intact, reinforced by appropriate interpretation.*

*Impact - LOW*

- 5. Physical character of the surrounding landscape and townscape, including any formal design or land use.** The surrounding (registered historic Milford Haven Waterway) landscape is mostly wooded, the majority of the existing woodland shown on maps from at least 1822 onwards. This heavily wooded area remains intact, despite intrusion by modern plantations.

The eastern track to the mill forms part of the historic eastern driveway to Slebech Hall, included within the Slebech Park Registered Park/garden.

*It is noted that most of the trees are to be retained within the near vicinity of the mill buildings. In terms of the proposed car park, the loss of the trees and engineering works will have some impact on the wider setting. Critical areas of tree cover lies outside of the development line, notably the wooded river-bank opposite the site, which would provide effective screening of the site when viewed from the public footpath/former east drive. If the development is granted consent, consideration must be given to designating Tree Protection Orders in the interest of preserving the setting of the listed buildings.*

*Impact - MEDIUM*

- 6. Potential buried or archaeological elements surrounding the historic asset.** This is presently unknown, *but given the early siting of the iron forge here, along with several surrounding sites record on the Historic Environment Record there is potential for archaeological material to be present and for buried features to be adversely affected by the development.*

*Impact - HIGH*

- 7. Views associated with the aesthetic, functional or ceremonial purpose of the asset.** See 1 above.
- 8. Historical, artistic, literary, place-name, cultural or scenic associations.** There are no known associations on a national or regional level, but the immediate vicinity of the listed buildings are popular with both local and visiting walkers. *No existing rights of way are affected, the access to much of the site being permissive.*

*Impact - LOW*

- 9. Other sensory elements – noise or smell associated with the historic asset.** The mill has been silent for over 50 years – whilst in use, it served a wide hinterland and would have operated on regular basis, with horse-drawn (and later motorised) vehicles importing grain and exporting flour. The tide was also an important means of conveying goods. A steam-powered sawmill operated here in the early C20 – some noise would have been created by this at intermittent periods, timber usually cut to demand.

For several years, the site operated as a minor but popular tourist attraction, with a tea room and shop.

*In terms of scale, the milling and tourism activities have not generated excessive intrusion through noise, smell etc. Whilst the proposed use of the mill as a tourist attraction is appropriate within the context outlined above, new sensory elements will be introduced via the assumed increased public footfall, the smells associated with the restaurant and the smells/noise associated with the railway. Of these, the railway remains the largest concern introducing an element entirely alien to the setting of the listed building both physically and in sensory terms with regards to whistle-blasts, general track/engine noise and the billows of smoke/steam.*

*The increasing numbers of vehicles within a sheltered wooded environment will result in an increased level of airborne pollution as well as traffic noise.*

*The proposed lighting introduces another alien element. Whilst an element of directional lighting is to be expected, the proposed mounted lighting on the buildings and low-level bollard lighting along the main access routes is intrusive. Historically, the only lighting would have been internal and minimal, during operational times in winter.*

**Impact - HIGH**

**10. Tranquillity, remoteness, 'wildness'** The mill and bridge were part of the Slebech estate improvements of the early C19, all part of the 'picturesque' and bucolic (not necessarily wild) character of the east drive to the Slebech Hall. A view of historic maps suggests that the landscape remains remarkably unaltered, the whole 'ethos' readily appreciated today thanks to the driveway also forming a public right of way. *Whilst an element of change is inevitable with regards to keeping the buildings in viable use, the scale of the proposal will undoubtedly have a high impact on the existing tranquillity and remoteness of the site, which are important ingredients of the setting of the listed buildings at Blackpool*

**Impact - HIGH**

## **11. Conclusion.**

Applying the setting 'tests' to the listed buildings at Blackpool Mill in the context of the proposed development, it is clear that the impact will be high, not just visually, but in a sensory context.

Whilst some mitigation could help, such as extra tree planting, the re-design/siting of the events buildings, the removal of the fencing and the reduction in parking/road improvements, one aspect of the development

remains practically impossible to mitigate against, this being the proposed railway.

Whilst most would welcome the proposed restoration of the mill as a visitor attraction, there is no sequential approach to see how other forms of development would act as a more sensitive 'enabler'. Given the incredibly unspoiled and tranquil nature of this site - and a setting that has remained little-changed for just over two centuries – it is felt be that the development is harmful to the setting of the listed buildings at Blackpool Mill and High Toch with particular regard to the proposed railway, platform, station, fencing and events building, and must therefore be **refused**.

Were the decision be for approval, mitigation could include the reviewing/making of a number of Tree Protection Orders within the site, as well as on the north bank of the Eastern Cleddau, using both existing viewpoints and historic maps as points of reference. In addition, a comprehensive planting scheme would be necessary.'



Figure 7 - Mill and former forge building

### Buildings at Risk

CADW compile a national list of listed buildings which are surveyed approximately every 5 years to ascertain the degree of risk to each.



Within the PCNP area there are 1082 listed buildings which are not at risk, 122 which are deemed 'vulnerable' and 82 which are 'at risk'. Risk is further separated into categories of; 'at risk', 'at grave risk' and at 'extreme risk'.

Blackpool Mill falls within the lowest category of risk, being deemed as vulnerable due to the condition of the roof and windows. Although the submitted Design and Access statement refers to the building being in such a perilous state as to be likely to not last a further year without significant works being undertaken, no structural survey has yet been undertaken by the applicants.

### Enabling Development

CADW's 2011 'Conservation Principles' describes the principles of enabling development as that which would secure the future of a significant place, but contravene other planning policy objectives, and should be unacceptable unless:

- a) it will not materially harm the heritage values of the place or its setting
- b) it avoids detrimental fragmentation of management of the place
- c) it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose
- d) it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid
- e) sufficient subsidy is not available from any other source
- f) it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests
- g) the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.

The submitted Planning Statement details at para 3.2 that Bluestone have a *'full repairing lease with the Dashwood Estate costs Bluestone £25k per year, plus baseline maintenance costs of £55k per year, and there are additional costs of £5-10k for insurance and security measures. Whichever business proposition chosen to support the building would therefore have to generate significant revenues in order for these costs to be covered. Consequently a small tea room and exhibition are not able to support and the appeal to the public would need to be much wider, with more opportunities to generate revenue'*.

The lease is understood to be a 99 year lease. No details of the previously operating café/tea room have been provided although the 25,000 to 30,000 visitors a year between April and October are partly used to underpin the submitted transport strategy.

It would be expected where enabling development is the key justification for a development contrary to local plan purposes that a detailed options appraisal

would be carried out by heritage professionals to ascertain the most appropriate and viable option for the development of the site. However, the supporting information relating to this is scant detailing that research was carried out into the potential introduction of other forms of attractions; which included the following:

- An outward bound centre
- A craft centre
- A falconry centre

The submitted Planning Statement at 3.5 details that: *'All three of the above would have to compete with existing activities available in Pembrokeshire, and it was considered that the markets were limited in terms of appeal to visitors. Furthermore the activities are not relevant to the provenance of the building, as a historical asset. Certainly the activities associated with the outward bound centre (canoeing, rafting, mountain biking, pony trekking etc) would impact on the area in terms of ecology.'*

*3.6 With the above options ruled out; Bluestone arrived at the solution to create an 'immersive' visitor experience linked to the historical context of the Mill. This would be similar to other successful ventures at, for ex-ample, Beamish Living Museum and Hampton Court Palace. These exemplar attractions illustrate the commercial success that an immersive visitor experience can realise – an experience which Bluestone could emulate at the Mill, which would enable the unique heritage asset to be shared by creating an interactive, participatory experience whilst placing Black Pool Mill back into its original context.'*

This is the total information received in regard to a request for an options appraisal, and it is not considered to be a thorough analysis of the potential options for the site. It is interesting to note the comment on the lack of relevance to provenance of the building, which would equally apply to both the proposed railway and events building.

A description of the previous use as a tea room and heritage centre for 25,000 visitors has been described as non-viable, although no figures are provided to evidence this. Anecdotal evidence of the costs of the building to repair compared to the profits available are given as the reasons for the previous use having ceased. The applicants have been asked why the proposed snow dome or sky dome at Bluestone National Park Resort could not be used as the enabling development in this case, but no answer has been forthcoming.

In *Northumberland County Council-v-Secretary of State for the Environment*(1989) JPL 700, 702, it was held that the land to be benefited does not have to be in close proximity to the land which is the subject of the application. Enabling development may therefore be proposed on some distant site in the same ownership as well as within the place or its setting; but in practical terms it will normally be within the same local planning authority area. Distant sites have the obvious advantage of avoiding any harm to the significant place or its setting.

Alternative options of siting the steam train and events barn either across the road behind the existing Blackpool Farm complex and adjacent to the car park and land train access have been suggested during discussions of the merits of the application, but the applicants have not formally responded to date as to why this would not be possible. It is understood that the steam train would need to be located on flat land, but as the accompanying land train application demonstrates, there may be an engineering solution to allow for this.

There is ample space in the meadow behind Blackpool Mill Farm (which is the applicants ownership) to locate an 'events barn' on the scale proposed adjacent to the Mill, which is where 70% of the visitors to the Mill are anticipated to arrive, and logistically, it would seem both reasonable and practical to remove the harm caused by the siting of the building in the immediate setting of Blackpool Mill.

The need for major funds to secure a sustainable future for a place often arises because its condition has been allowed to deteriorate over a long period. Functional redundancy, leading to the need to find the optimum viable new use, is often blamed for this.

Regular maintenance and repair are the key to the preservation of historic buildings. Modest expenditure on repairs keeps a building weathertight and routine maintenance can prevent much more expensive work being necessary at a later date. Major problems are very often the result of neglect, and, if tackled earlier, can be prevented or reduced in scale. Regular inspection is invaluable, and it is clear that the current state of the building is due to a lack of regular maintenance over previous years.

In this instance, the applicant has advised that if this application is not supported, the minimum required to ensure the preservation of the building will be undertaken. However, that minimum required is achievable through the serving of statutory notices, and in this instance, it is considered that the enabling development proposed is in excess of what is necessary to ensure the continued preservation of the building. There has been no sequential approach to balancing new development and the restoration of the Mill, which is the typical process preceding the application stage. The proposal has effectively been packaged as the only solution with scant attention to costed inputs and outputs and a vague reference to Edward Dashwood's restrictions on the 99 year lease.

The costs sheet supplied as part of the Planning Statement detail that the Mill requires £639,299, but this is not supported by either a structural survey or a detailed analysis of costs. Our Conservation Officer has estimated that the likely costs for repairing the roof and windows is likely to be in the region of £250k.

Viewed in the 'enabling' context, the proposal does not satisfactorily preserve the setting of the mill and is not demonstrated to be the minimum necessary to secure the future of the building.

## Ecology

The application site is located within close proximity to a number of designated sites (SSSIs and SACs). Policy 11 of the LDP relates to the Protection of Biodiversity and states:

*'Development that would disturb or otherwise harm protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species including Local Biodiversity Action Plan species and habitats will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures'.*

PCNPA Planning Ecologist was initially consulted on the pre-application documents received in May 2015 and identified the need for further ecological surveys at that point. The Ecologist has been consulted on the current application and the consultation response received is outline below:

*'Since my letter dated the 1<sup>st</sup> February 2017 the applicant has provided some additional information in response to the concerns raised for NP/16/0678/LBA and NP/16/0677/FUL. The additional information relates to amended plans for NP/16/0678/LBA showing proposed mitigation in The Mill and former Engine House/former Mill Cottage. These plans should be submitted with NP/16/0677 to ensure the correct plans are referred to.*

*Notwithstanding this several concerns raised originally have not been addressed and in my opinion would constitute a recommendation for refusal.*

*These include:*

- Low survey effort given the scale of the proposed development, proximity of the SSSI component site at Slebech and quality of foraging and commuting habitat.*
- No bat activity surveys have been undertaken of the proposed car park area – transect and tree surveys.*
- The proposed car park, steam railway and events barn will result in a loss of foraging habitat and habitat fragmentation. No assessment has been made to understand the significance of this impact on the features of the Pembrokeshire Bat Sites and Bosherton Lakes SAC. In part this is as a result of there being no surveys to inform the assessment.*

- *No survey reports have been submitted so it is not possible to investigate the data or review the findings.*

*The development site is within 2.7km of the Slebech Stable Yard, Loft, Cellars and Tunnels SSSI, a component site of the Pembrokeshire Bat Sites and Bosherton Lakes SAC. The site is designated, amongst other things for its populations of Greater Horseshoe (GHS) and Lesser Horseshoe (LHS) bats. The GHS and LHS recorded on site are likely to be associated with the SAC populations and the proposed development must be assessed thoroughly to ensure there is no detriment to the Favourable Conservation Status of the populations concerned and that there is no adverse impact on the integrity of the features of the SAC.*

*This assessment is a requirement of the Conservation of Habitats and Species Regulations 2010 (as amended) under Regulation 61 (1). This requires competent authorities, in this case the Local Planning Authority, to carry out an appropriate assessment of a plan or project, if that plan or project is likely to have a significant effect on a SAC site. This must be undertaken prior to determination and cannot be conditioned.*

*PPW, TAN 5: Nature Conservation and Planning states 'Regulation 48 places restrictions on the granting of planning permission for development which is likely to significantly affect a European site or European offshore marine site, and which is not directly connected with or necessary to the management of that site, by requiring that an appropriate assessment is first carried out in respect of the implication of the development for the sites conservation objective'. If the appropriate assessment cannot conclude that it would not have an adverse effect on the integrity of the site then the competent authority is prohibited from undertaking or giving consent to the plan or project.*

*The assessment must be sufficiently detailed and robust enough to answer the question 'can it be ascertained that the integrity of the SAC site will not be adversely affected?'*

*In consultation with NRW an appropriate assessment has been undertaken, please see attached document Habitats Regulations Assessment, Appropriate Assessment, NP/16/0677. The assessment has concluded that due to a lack of information it cannot be ascertained that the integrity of the SAC site will not be adversely affected. The surveys undertaken to date have not established the levels of use of the surrounding habitat, specifically the area of the car park, so as to allow an assessment of the impact of the proposed development on foraging and commuting bats.*

*The assessment must also consider the impact of loss of foraging habitat for hibernating bats. The findings of the surveys undertaken consider the basement of the Mill building likely to be a hibernacula for Greater horseshoe bats but no additional survey work was undertaken to confirm presence or otherwise. Hibernation is interrupted between once a day and once every 6-10 days (depending on the temperature and time of year) to feed. Thus the importance of retaining suitable foraging sites nearby to hibernation roosts is essential to maintaining the status of the roost. The areas of woodland to be lost as a direct result of the proposed car park would fall within a core sustenance zone for feeding bats, during the months September/October-April, their period of hibernation.*

*Furthermore no tree surveys have been undertaken of the areas to be felled to establish if roosts are to be disturbed or destroyed by the proposed works.*

*On this basis I would object to the proposed development and recommend refusal until such time that adequate survey work has been undertaken and compensation or mitigation proposed to inform an appropriate assessment of the effect of the proposed development.*

*It is considered the following would constitute the minimum level of additional survey work to provide adequate information with which to carry out an appropriate assessment:*

- Summer surveys between April and October to cover all months not previously surveyed. These should include walked transects, static detectors and tree surveys.*
- Winter surveys between October and April. These should include roost checks for hibernating bats, static detectors and walked transects.*

*The surveys should also consider the potential presence of Barbastelle roosts, which are known to be present within Canaston Woods and Serotine's, which have been recorded in the area.*

*These surveys are required as a result of the proposed habitat loss and fragmentation and the impact on features of the SAC and not as a result of the proposed development of the Mill building.'*

Having regard to the lack of survey effort and the requirement of the Local Planning Authority to undertake Habitats Regulations Assessment based upon the additional survey work required, the application cannot be supported without the surveys outlined above being undertaken and submitted for consideration and a HRA being carried out.

### **Highways**

The application proposes a large car park opposite the development site on land which is currently comprised of an informal car parking area and tree planting. The proposed car park will accommodate 150 vehicles and access will be gained via the minor road, Blackpool road. The application states that 70% of the 150,000 predicted annual visitors to the attraction will arrive via the land train from the Bluestone National Park Resort and 30% will arrive via Blackpool Road and use the car park.

Policies 52 and 53 of the Local Development Plan specifically refer to the traffic impacts of proposed development.

The Transport Department made the following comments on the 27<sup>th</sup> January 2017;

'At the pre-application stage a number of issues were raised which required addressing. These issues do not appear to have been addressed as part of the application therefore the LHA is unable to support the application in its current form.

### **Access**

The primary vehicular access to the site is via an existing minor County Road which is referred to in the Transport Statement as Blackpool Road. The road is generally single track and is well used by walkers, cyclists and equestrians.

Accident data indicates that there are no known accident issues along this road, however this would be expected for such a lightly trafficked road. The proposal has the potential to significantly increase the traffic flow along the Blackpool Road, intensifying the potential of conflict between 2-way traffic and existing or new vulnerable road users, including horse riders, cyclists and pedestrians, which this area is very popular with.

### **Parking**

A large car park of 150+ spaces has been proposed to the south of the County Road. It is not clear without an accurate traffic prediction that the level of car parking would be adequate. It is also possible that the car park is oversized for the development when considering the suggestion that 70% of visitors will attend from Bluestone Resort on foot or by land train.

Notwithstanding this, at this time the lack of information means that we are unable to establish the level of parking required, which is very important as a car park which is too large will have a detrimental impact on the landscape and a car park which is too small will result in indiscriminate parking in passing places, on verges etc.

As the car park is located on the south side of the road, this will require visitors to cross the road from the car park at a location where additional

traffic to the development is travelling to the car park. Consideration must therefore be given to ensure safe pedestrian access from the car park to the leisure development is achieved, which is also likely to have an impact on the nature of the lane.

#### Traffic Attraction

The Traffic Statement (TS) has suggested that the proposal can accommodate up to 1000 visitors per day during peak periods. It then goes on to state that around 70% of visitors will come from existing guests staying at the Bluestone resort. The TS suggests that the benefit of this will be that a majority of visitors will walk, cycle or use a land train to access the proposal, therefore traffic levels on the Blackpool Road as a result of the development will be low.

Whilst the 70% or 700 visitor level from Bluestone may be achieved on occasions, the possibility of this occurring each day appears impractical and too simplistic an approach. Furthermore, there appears to be no way to control off-site visitor trips. Whilst online booking is referred to as an element of control, this would not prevent pass-by tourists attempting to access the attraction and there is no confirmation that pass-by business would be turned away; even if it was, the traffic impact will have taken place. There is also reference to "larger events" which have not been considered within the TS. This proposed traffic generation and visitor split therefore appears impractical, unenforceable and unlikely to be achieved.

When considering this, there can be no confidence in the traffic flows predicted in the TS. In order to establish an idea of likely traffic flows, the category of Country Park was integrated on the TRICS data base, albeit it would be expected that this proposal would exceed the traffic attraction to a country park. This showed an average two way trip of 3.1 vehicles per parking space so 465 vehicle trips a day, assuming the car park is considered to have sufficient spaces. Whilst it is accepted that a number of trips may be influenced by the number of visitors arriving from Bluestone, the disparity of the figure trip figure identified in TRICS of 465, compared to the TS figure of 200 per day is too great.

In order for this proposal to be supported, a robust Transport Assessment, considering a realistic worst case traffic generation scenario must be provided, with proposals of how off site visitors will be controlled, if this is to be taken into consideration with regard to reduced traffic flows.

The car park provision must be shown to be adequate based on likely trip attraction. Also improvements to Blackpool Road, such as footways and shared use paths, passing bays and a crossing point must be established and identified, this is essential to ensure any amendments to the highway network can be considered by the Local Highways Authority and the Local Planning Authority.



Accordingly, the application cannot be supported at this time for the following reasons:

1. Lack of detail with regard to potential trip attraction to the development which prevents adequate levels of highway improvements to Blackpool Road and the surrounding PROW network being established in order to mitigate the impact of the development.
2. Lack of detail with regard to potential trip attraction to the development which prevents adequate levels of parking being established to serve the development.
3. The development in its current form will result in a detrimental impact on existing road users, in particular walkers, cyclists and horse riders.
4. The application has the potential of significantly increasing vehicular conflict between vehicles on this predominately single track lane.'

Since the above comments were made, there have been several meetings held at PCNPA and on site to try to resolve the highways issues, and the most recent meeting, on the 31<sup>st</sup> March, the applicants, agents, officers and transport engineers met on site to walk the access route and discuss options. At this meeting, it was suggested that a Traffic Order to alter the road to a 'green lane' speed of 20mph may be the most effective way of mitigating the danger to vulnerable users by an increased number of cars. As the 70/30% split of visitors is purely a hypothetical figure, measures were also discussed to include a potential traffic monitoring scheme via a S106 agreement which would require the applicants to make adjustments to the parking provisions and the user routes to the attraction should the predicted levels of traffic be exceeded.

Together with a section 106 planning obligation a number of potential improvements to the roadway were discussed to include narrowing of the road, passing bays, and shared surface treatments, but to date, no proposed plans have been received for comment.

Consideration also has to be given to the impact on the existing car parking situation, as the surrounding area is very popular with walkers and horse riders. The existing car park is frequently used by horse riders and the car park is used to park horse boxes, the loss of this facility could displace the parking pressure of these vehicles to other areas including Minwear Woods car park, highway verges etc.

In addition to this, the your officers consider the proposed car park to be oversized, and have suggested an alternative plan to allow for the existing Bluestone access and roundabout to be utilised by all traffic, with the land train being the primary means of transport to the Mill, thus reducing the impact on cyclists, walkers, and horse riders. This suggestion has not been viewed favourably by the applicants.

### **Impact on Rights of Way**

Path user counters at Toch Wood and Minwear Wood indicate the levels of use in 2015 of Public rights of Way to be 11,680 and 8,939 respectively. By comparison the seven Coast Path counters range between 12,000- 38,000 in 2015.

The locality is a popular destination for walking, cycling and horse riding on the extensive network of predominantly woodland paths in Minwear & Canaston wood and Slebech park (public rights of way and permissive paths). In addition to the walk mentioned above, there are a number of promoted routes starting from the parking areas at Canaston Bridge, Minwear Wood and Minwear picnic site.

The locality is currently an easily accessible destination for walking, cycling and horse riding being close to the A40/A4075 junction at Canaston Bridge. The network of paths provide many safe off-road riding opportunities. The destination has traditionally been valued for its tranquillity, comparative remoteness and largely unspoilt natural beauty, characteristic of the upper reaches of the Daugleddau waterway.

As part of the National Park Authority's country path user survey 2015/16, one of the twelve survey stations was based at Minwear car park on the south of the proposed development boundary. The survey ran for 12 months and ended in July 2016. There were 243 completed questionnaire forms collected from Minwear over the year. The results showed that 66% were residents of the county; walkers were asked to state the reason for their visit and the most popular response was to enjoy the natural landscape (ranked as the highest by 68% of respondents).

Accordingly, it is considered that the introduction of the proposed development at this tranquil location will result in adverse impact on the users of the rights of ways and permissive paths surrounding the site.

### **Economic Benefits**

The justification for the ancillary development adjacent to the Mill is the necessity to create a viable tourism attraction. The application is described as an extension of the Bluestone resort which has an existing workforce of 700 people.

The submitted Planning Statement details that 60 year round jobs (45 full time equivalents) will be created as a result of these proposals with the occupancy rates of Bluestone Resort boosted by the proposals creating a further 20 jobs on the main resort.

Further indirect employment is supported by the existing Bluestone resort, with 90% of suppliers based in West Wales. Bluestone currently operates at 94% average occupancy all year and delivers guest numbers in excess of

3,000 per week with Bluestone's research showing up to 65% of these guests (1,950) visit offsite attractions, restaurants, shops, etc. It is estimated that this residual spend could contribute an additional £330,000 of incremental revenue per year to the Pembrokeshire economy.

### **Flooding**

Reference has been made in the documents submitted with this application to the site being within a flood zone. Whilst this may be found to be acceptable, part of the site is susceptible to coastal flooding and regard needs to be had for predictions of sea-level rise which may increase the frequency, intensity and area of flooding. Whilst the proposal would not be categorised as a 'vulnerable use' and mitigation could be put in place it is important that the applicants realise that the use of the site for this purpose may have a limited life-span.

### **Community Benefits**

The application details community use of the events barn, but there is a level of conflict within the documents which detail that the hours of use (and lighting) are only proposed to be 10am -5pm to minimize the impact on the local environment, but that the building will only be available for community use outside of opening hours.

The submitted planning statement details:

*6.64 The development will create new facilities which would be available for the use of local groups and societies, for example, the Mill Society and other local history groups. Other groups, for example wildlife trusts, ramblers organisations, and railway groups will be attracted to the site through the improvements and enhancements proposed.*

*6.65 The proposed events barn will be available for staging community events, including craft and food fairs, sporting competitions and will be an all weather venue. The proposed events barn will be available for staging community events, including craft and food fairs, sporting competitions and will be an all weather venue. The Ward, in which the site lies, Martletwy, as the most deprived area in SE Pembrokeshire in terms of access to services, will benefit by the scheme.*

Martletwy Community Council however, have expressed concern that any extension to the opening hours (10:00-17:00) would not be acceptable as it would have a detrimental impact on wildlife, local residents and the local environment. Thus far, PCNPA have not seen any evidence of any identified community group having expressed interest in the use of the building, so its primary use must be taken as a private facility to Bluestone/Blackpool Mill visitors. Llawhaden Community Council have also expressed concerns over the proposals.

Planning Policy Wales, emphasises in Chapter 7 that the planning system should support economic growth within the context of sustainable development and that economic development should facilitate regeneration and promote social and *environmental* sustainability, and TAN 23 where, it is stated that *'it is essential that the planning system recognises and gives due weight to the economic benefits associated with new development'*. This however, must be considered in light of the balance to be struck between preserving the tranquility of the National Park, the "Sandford Principle" and the long term impacts of allowing theme-park style development directly adjacent to an important historic building and the subsequent impact this will have on the character of the local area.

### **Conclusion**

The proposed development will by virtue of its scale, design and location will result in a harmful impact on the Special Qualities of the National Park, particularly in regard to the adverse impact on tranquility and the sense of remoteness of the application site and surrounding area. The application is, therefore, contrary to Policies 8 and 15 of the adopted LDP.

The proposed development will have a harmful impact on the setting of Grade II\* listed Mill building and ancillary buildings and the setting of the Grade II listed High Toch farmhouse, with particular regard to the proposed railway, platform, station, fencing and events barn, which is contrary to adopted LDP Policy 8.

The application is lacking sufficient information in order to allow the local planning authority to properly assess the impact of the development on protected species and nearby designated sites.

In regard to the highway impact of the development the application is lacking a traffic monitoring scheme and highway improvement details as to provide the local planning authority with sufficient confidence that the development would not result in a detrimental impact to highway and pedestrian safety.

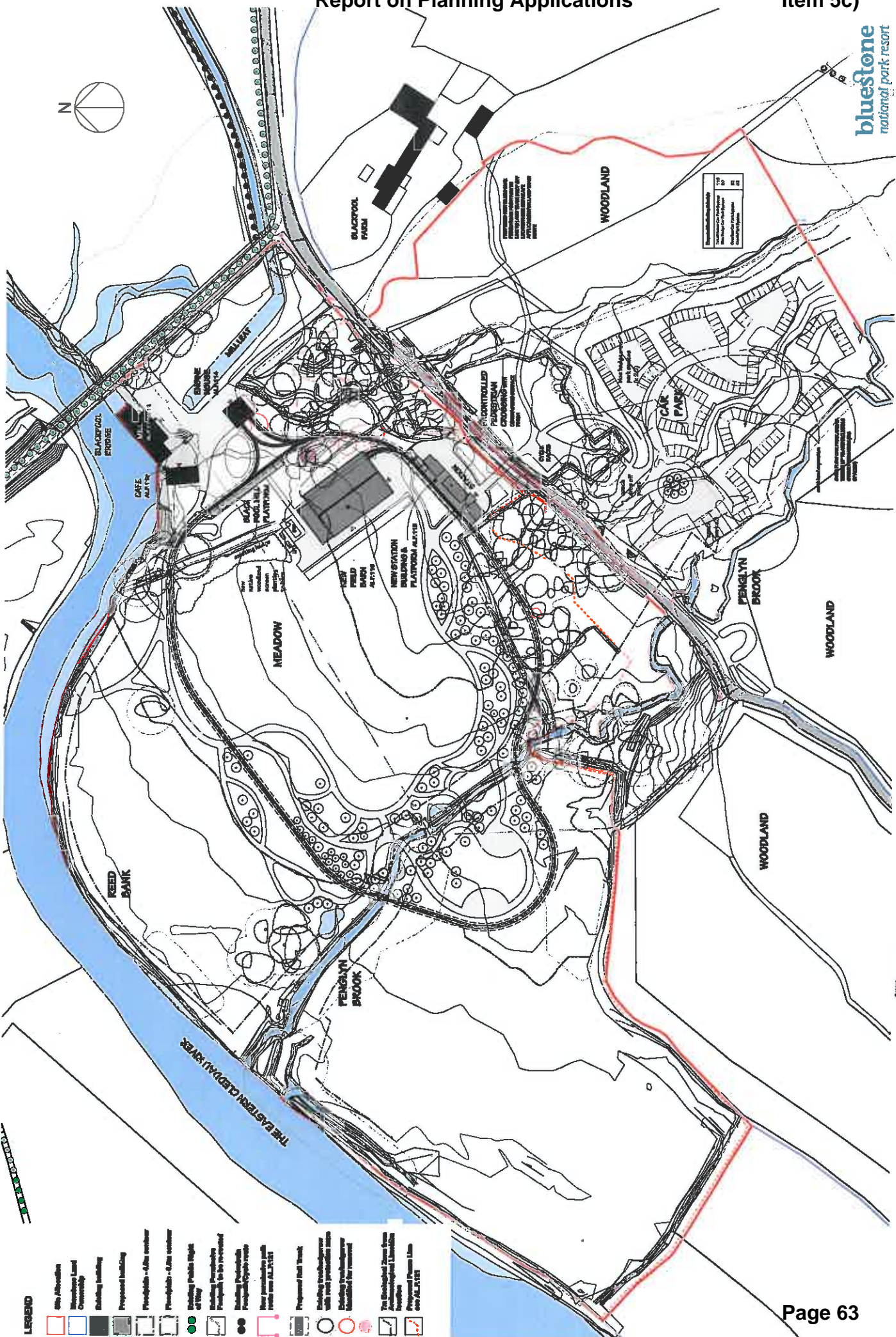
Whilst, it is acknowledged that the development will result in an economic benefit to the area and will restore a Grade II\* listed building, the harmful impacts of the development on the special qualities of the National Park and the setting of the listed buildings are not outweighed by the economic factors. The "Sandford Principle" clearly states that "Where irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority", as such, the application as proposed cannot be supported.

### **Refuse for the following reasons:**

1. The proposed development by virtue of its scale, design and location would result in a detrimental visual impact on the locality and harm to the special qualities of the National Park. The proposed development will result in a significant loss to the sense of remoteness and

tranquillity of the area and will be insensitively and unsympathetically sited within the landscape and will introduce a development not compatible with its location and is therefore contrary to Policies 1 (National Park Purpose and Duties), 8 (Special Qualities), 15(Conservation of the Pembrokeshire Coast National Park) of the adopted Local Development Plan (2010) and Planning Policy Wales (Edition 9) 2016.

2. The proposed development by virtue of its scale, design and location would result in a harmful impact to the setting of the Grade II\* listed Mill building and ancillary buildings and the Grade II listed High Toch farmhouse to the detriment of the historic environment of the locality and to the special qualities of the National Park. The development is therefore contrary to Policies 1 (National Park Purpose and Duties), 8 (Special Qualities), 15(Conservation of the Pembrokeshire Coast National Park) of the adopted Local Development Plan (2010).
3. Insufficient details have been submitted in respect of the impact of the development on protected species and designated sites to allow the local planning authority to properly evaluate the impact of the development and carry out a Habitats Regulations Assessment, which is contrary to Policy 11 of the adopted Pembrokeshire Coast National Park Local Development Plan (2010) and the Conservation of Habitats and Species Regulations 2010 (as amended).
4. Insufficient information has been submitted in respect of the control of vehicle movements, parking monitoring and highway improvements in the form of a legal agreement to allow the local planning authority to properly evaluate the impact of the development on highway and pedestrian safety. The application is therefore contrary to Policy 53 of the Pembrokeshire Coast National Park adopted Local Development Plan (2010).

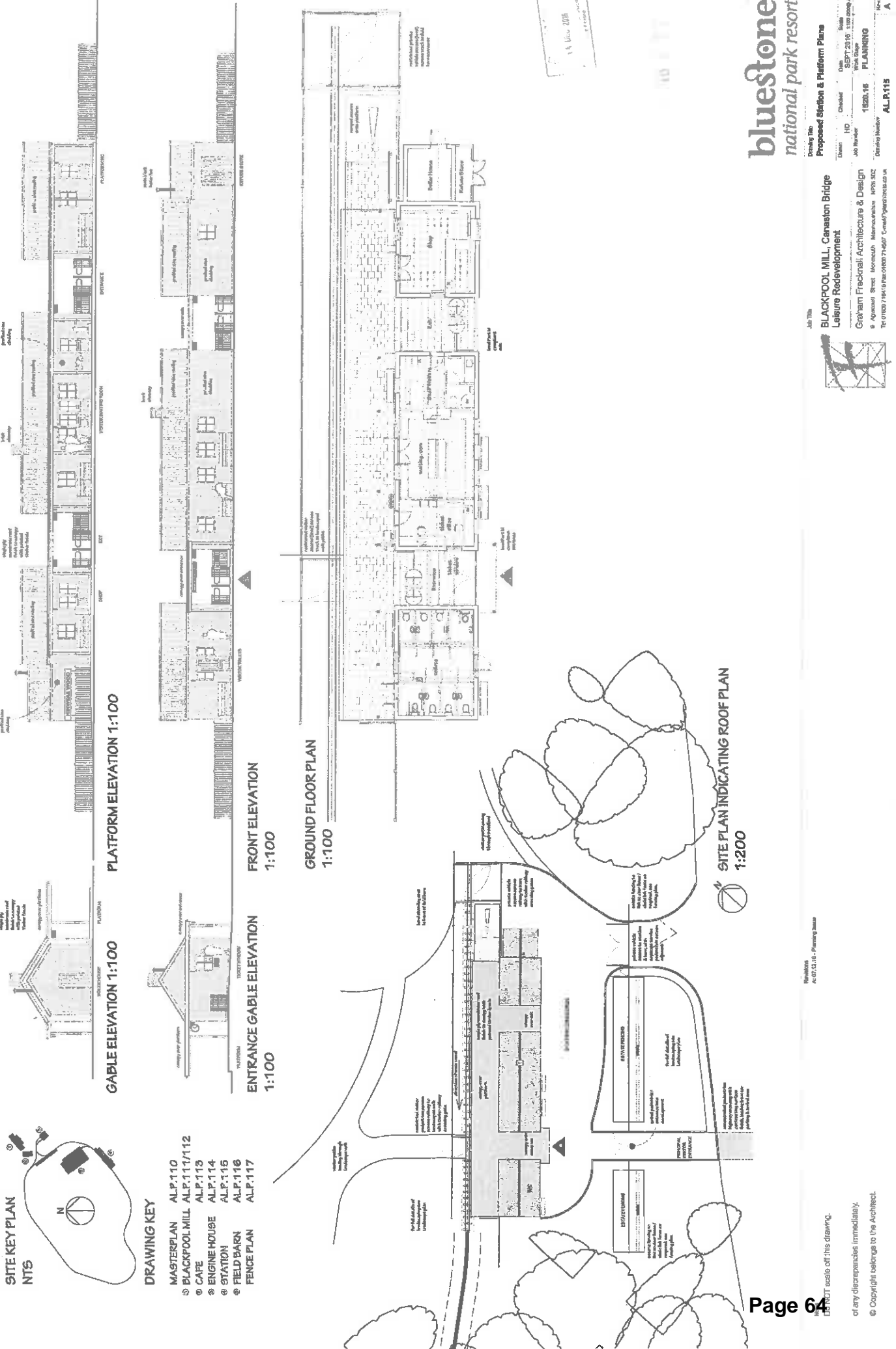


**LEGEND**

- Site Allotment
- Neighbourhood Land Community
- Existing building
- Proposed building
- Proposed - 0.5m contour
- Proposed - 0.2m contour
- Building Public Right of Way
- Building Private Right of Way
- Building Proposed Right of Way
- Proposed Right of Way
- New construction with built area 1:10:1
- Proposed Rail Track
- Building to be demolished with new construction site
- Building to be demolished with new construction site (to be removed)
- The boundary lines from the original site plan
- Proposed Green Lane
- Date: 15/10/2020

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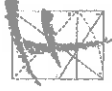
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Drawing Title: Proposed Station & Platform Plans  
 Date: 18/07/2016  
 Checked: HD  
 Job Number: 1820.16  
 Work Stage: PLANNING  
 Drawing Number: ALP.115

Job Title: BLACKPOOL MILL, Capheaton Bridge Leisure Redevelopment  
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Revisions:  
 A: 07.12.16 - Planning Issue

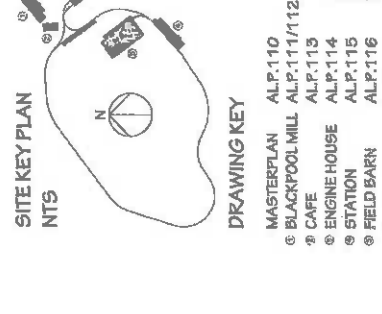
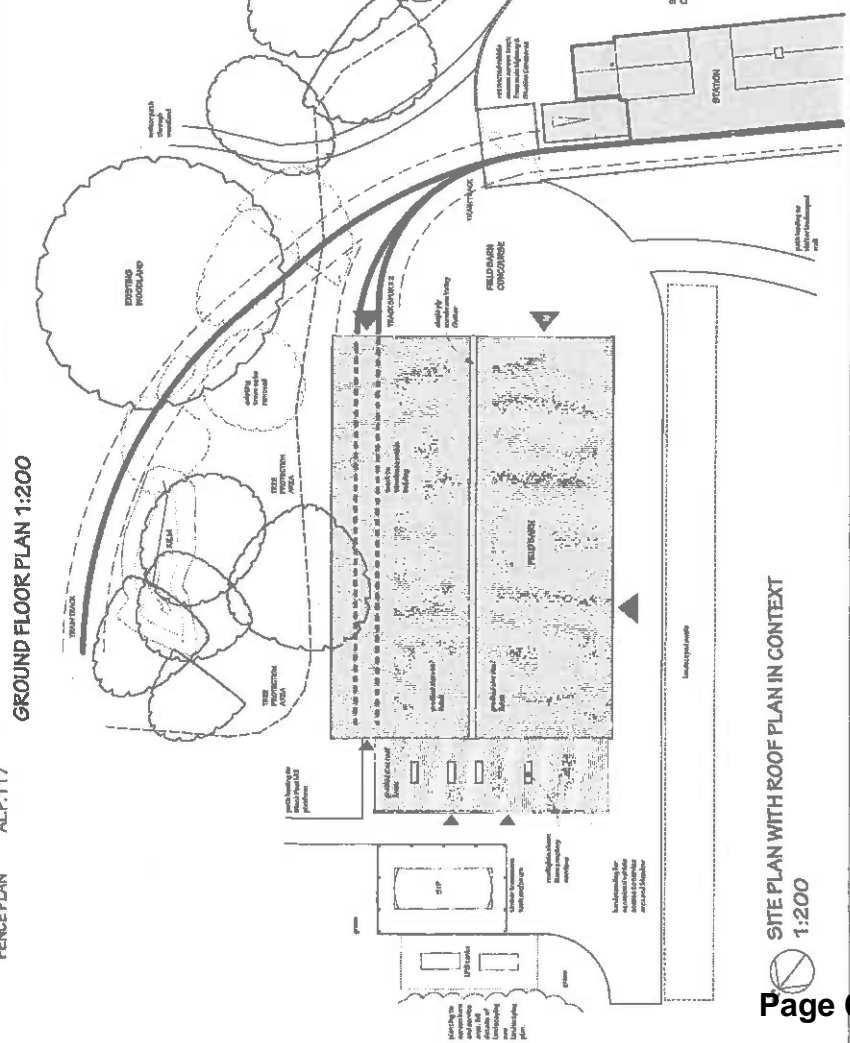
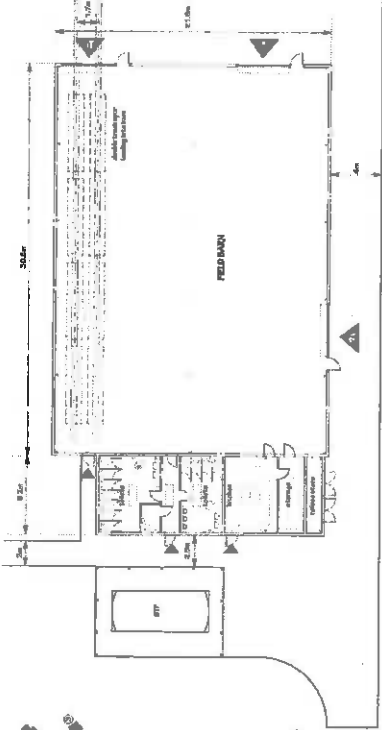
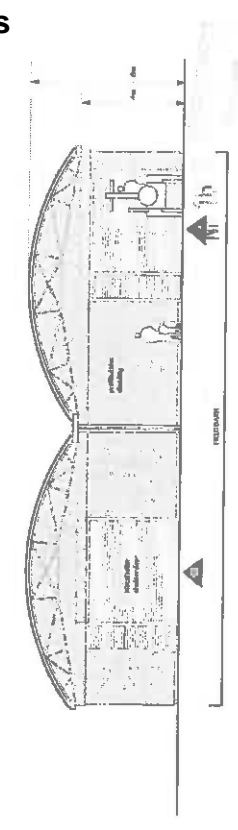
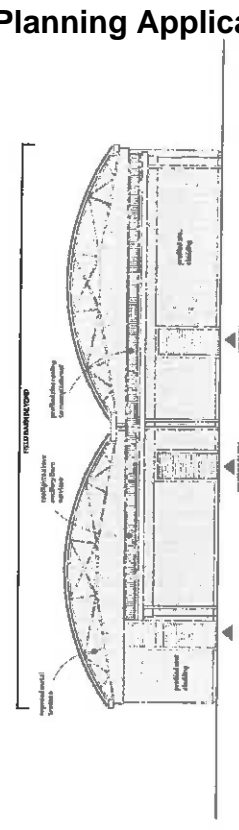
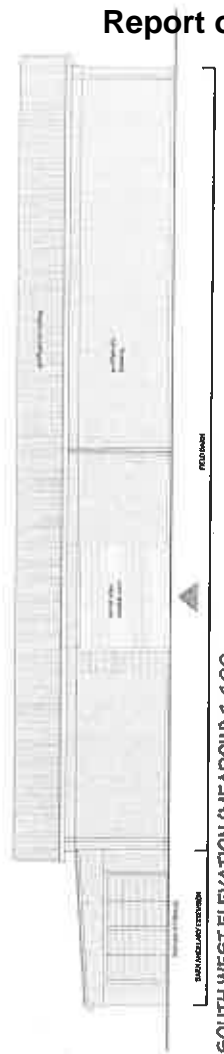
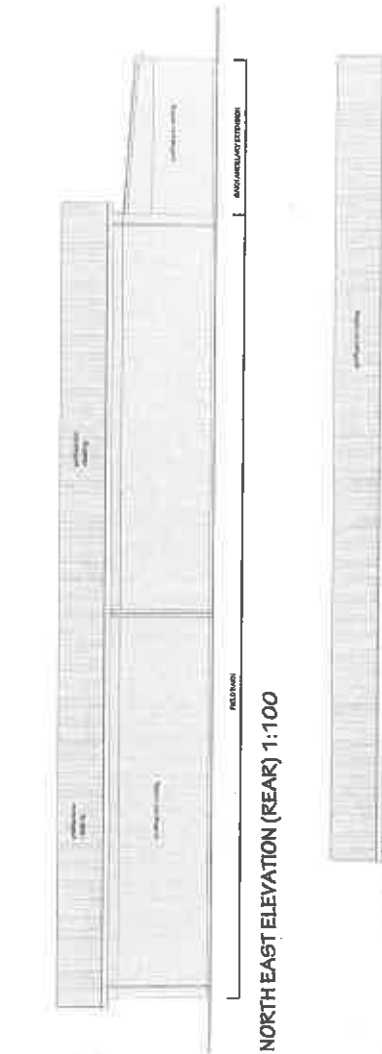
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|--------------------------------------------|---------|------------|------------|
| Drawing Title<br>Proposed Field Barn Plans |         |            |            |
| Drawn                                      | Checked | By         | Date       |
| HD                                         | HD      | SIERT 2016 | 11/20/2016 |
| Job Number                                 | 1503.16 | Work Stage | PLANNING   |
| Drawing Number                             | ALP.118 |            |            |

Job Title  
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- DRAWING KEY**
- MASTERPLAN ALP.110
  - BLACKPOOL MILL ALP.111/112
  - CAFE ALP.113
  - ENGINE HOUSE ALP.114
  - STATION ALP.115
  - FIELD BARN ALP.116
  - FENCE PLAN ALP.117

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