

<b><u>Application Ref</u></b>	<b><u>NP/16/0679/FUL</u></b>		
<b>Case Officer</b>	Kate Attrill		
<b>Applicant</b>	Bluestone National Park Resorts Ltd		
<b>Agent</b>	Mr L Page, Asbri Planning Ltd		
<b>Proposal</b>	Engineering works to facilitate the land train route from main resort centre, due north, to link with newly refurbished & extended car park to serve the Blackpool Mill proposal.		
<b>Site Location</b>	Blackpool Mill, Blackpool Bridge, Narberth, Pembrokeshire, SA67 8BL		
<b>Grid Ref</b>	SN06711386		
<b>Date Valid</b>	22-Feb-2017	<b>Target Date</b>	18-Apr-2017

Members visited the site on the 27th February 2017 to view the route of the land train and the accompanying applications for the Mill and ancillary development.

The application is reported to the Development Management Committee for consideration because it raises matters of significant public interests and is part of the overall development of Blackpool Mill and surrounding land (NP/16/0677 refers).

The application was initially received on the 14th December, but it was found that the submitted plans were incomplete as the areas of the cuttings/excavations had not been shown on plan and the site area was thus inaccurate. Revised plans were received on the 22nd February and the application re-validated.

An addendum to the Environmental Statement was also received to account for the cumulative impact of the application in conjunction with NP/16/0677 for the conversion of the Mill, the steam train, tracks, station, platform, car park and events barn and this application is therefore considered to be EIA development as an integral part of the transport strategy relating to the previous application.

The application for the land train has been submitted separately to the application for the development of Blackpool Mill and surrounding land (NP/16/0677 refers). However, the land train is a critical part of the overall development scheme in terms of the highway impacts. The agent has not provided an explanation as to why the entire development was not submitted as one application, which would normally be the case for such a development.

The land train application was not part of the pre-application advice sought in relation to the wider scheme.

## Site Description

The proposed land train route is located across several fields divided by hedgerows, flanked on the north eastern side by Canaston Woods and on the south western side by the woodland known as Pen Glyn.

Blackpool Farm is adjacent to the northern most field, and beyond that on the opposite side of the road, Blackpool Mill itself. The Bluestone Resort lies adjacent to the southern end of the proposed route.

## Description of Development

The land train itself is shown on application documents as a land-rover with a number of carriages behind. The land train already operates within the Bluestone resort and provides access across the site and to the Blue Lagoon.

The track, to include the base is shown as being 4.6 metres across and approximately 595 metres distance with a large loop for a turning circle to the immediate east of Blackpool Farm. The land train route will run from the Bluestone resort to the rear of Blackpool Farm and will have pedestrian access to the car parking proposed under planning application NP/16/0677.

The route involves a section of fairly steep hillside which is to be excavated to provide a gradient of no more than 1 in 8 for the land train, with cuttings of up to 11 metres across and 4 metres deep.

Lighting bollards are proposed every 18 metres of the route (in the lighting schedule) but every 17m on the submitted plans, and a covered cycle shed measuring 8.1 metres by 2.2 high by 2.1 wide is located adjacent to the proposed turning loop for the train.

A 6 foot timber fence is proposed to the southern and eastern boundaries of Blackpool Farm to separate it from the development, as it is currently being used for staff accommodation.

The transport assessment submitted for NP/16/0677 proposes that 70% of the predicted annual 150,000 visitors to Blackpool Mill will come from the Bluestone Resort and that the land train will mitigate the impact on the narrow rural lane which currently serves Blackpool Mill.

## Consultee Response

**Llwhaden Community Council:** Concern

**Martletwy Community Council:** No objections to the proposal however they would expect conditions to be put in place to ensure the protection of the existing natural habitat and to ensure the proposal does not have a detrimental effect on existing residents.

**PCNPA - Tree and Landscape Officer:** Unable to provide a full response due to lack of information. The provision of this information will allow an informed response to be made on the suitability of the proposed development

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in accordance with the tree and landscape features on and immediately adjacent to the development site.

**PCNPA - Ecologist:** Further information is required prior to determination to consider the potential impact of the proposed scheme on European Protected Species and to consider if mitigation or compensation is required.

**PCC - Drainage Engineers:** The Applicant should be made aware that surface water from all additional impermeable areas created by the development should be discharged to soakaways or some form of sustainable drainage system.

**Natural Resources Wales:** We have no objection to the proposed development providing a lighting plan condition is included within any permission granted.

**PCNPA - Buildings Conservation Officer:** No objection

**Dyfed Archaeological Trust:** Conditional Consent

### **Public Response**

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

The majority of letters of both objection and support detailed under the previous report for NP/16/0677 included the reference number for NP/16/0679, but the majority of the letters related to the steam train and the events barn and not this application. Those concerns are therefore addressed in the Committee report for NP/16/0677.

### **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>

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  
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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  
LDP Mineral Safeguard  
Biodiversity Issue  
Recreation Character Areas  
Landscape Character Assessment

### **Officer's Appraisal**

Whilst the previously considered application was to convert Blackpool Mill into Victorian attraction with ancillary development to the west and south of the Mill, the land train application provides the physical link which underpins the transport strategy submitted in relation to NP/16/0677.

### **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
- Sustainable Transport
- Arboricultural Impacts
- Ecological Impacts

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

The proposed development is located in the countryside, therefore policy 7 of the Local Development Plan (LDP) is relevant. Policy 7 allows for certain developments in the countryside, including tourist attractions where the need to be located in the countryside is essential. The land train providing a sustainable transport solution connects Bluestone Resort to the proposed Blackpool Mill attraction, as such, the proposed development is considered to be acceptable at this location in this instance.

### ***Siting Design and Impact upon 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. The policy priorities are to ensure that the sense of remoteness and tranquillity is not lost, and wherever possible enhanced; that the identity and character of towns and villages is protected from poor design and layout, that the pattern and diversity of the landscape is protected and enhanced, that protected species and habitats are protected, and that the historic environment is protected and where possible enhanced.

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 Environmental Statement Addendum has examined the potential views from public rights of way and has identified that there are two locally promoted trails close by which may be impacted:

- *the Knights Trail, which bisects Canaston Woods, which is also Open Access Land, just to the north east of the site. Initially very close to the land train terminus at Blackpool Farm, the route is almost completely hidden by the density of woodland trees (beech) and holly understorey.*
- *the Landsker Borderlands Trail, which crosses the Eastern Cleddau at Blackpool Bridge before traversing rising ground, again on Open Access Land, towards Canaston Bridge; there are glimpses of the proposed landtrain route, where it crests the steeper slope from close to Blackpool Bridge and from the track on the opposite side of the Eastern Cleddau. However, both are considered to be inconsequential, and furthermore, as the 'Jubilee' woodland matures, the tree cover will increasingly conceal the proposed scheme.*

The Environmental Statement summarises that *'whilst the site is located just within the Pembrokeshire Coast National Park, the highest possible landscape designation, there are three very compelling reasons why there are no visual issues, neither individual nor cumulative, relating to this proposal, namely:*

*This is a low key gravel track, entirely appropriate to the character of this rural environment.*

*There are no publically accessible residential nor recreational receptors with clear, uninterrupted views of the proposed land train route.*

*For much of its length the proposed land train route passes between plantations of native trees and shrubs comprising the Diamond Wood scheme planted in 2012. Based on the current rate of establishment, it is likely that, for much of its length, the proposed land train route will be largely hidden by the emerging woodland vegetation, within a few years'.*

The proposed route, measuring 4.6m in width and although will have an impact on the immediate landscape it will not be highly prominent in the landscape and the adjacent land will remain unaltered and is, therefore, not considered to negatively impact on the Special Qualities of the National Park.

### **Sustainable Transport**

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

The National Park Authority officers are generally supportive of the principle of the land train route, but consider that the potential for a sustainable link between the improved access provided for the Bluestone resort and the proposed development at Blackpool Mill could be made more sustainable by increasing the use of the land train proposal and by providing additional car parking if necessary at the main resort.

Based on there being 2 vehicular access points at Bluestone, one being currently used for construction, and that used for the Blue Lagoon, traffic could be directed to an alternative car park which does not rely on a narrow rural access lane, thus removing a significant element of concern on the application being considered under NP/16/0677. This is not in itself a reason for refusal, but it is unfortunate that a more sustainable traffic solution which is more in line with National Park Policies is not being proposed.

In order to ensure that the traffic/highway safety requirements of NP/16/0677 are met this application would have to be subject to a S106 agreement linking the two developments and requiring the implementation of the land train prior to the beneficial use of the proposed Blackpool Mill development (if approved). Whilst, draft heads of terms have been requested from the applicant's agent none have been submitted to date, as such, the application cannot be supported due to a lack of information.

### **Arboricultural Impacts**

The land train will be constructed on an area of open countryside, where there are a number of trees and hedgerows. The Authority's Tree and Landscape Officer has been consulted and advised that due to a lack of information it has not been possible to properly assess the application. The following additional information is required to make a proper assessment of the development:-

- Tree Survey
- Pre-development tree work
- Tree Protection
- Arboricultural Method Statements
- Details of any additional landscaping and new planting including translocation of previous tree planting.

The application has not included a survey of trees which will be impacted by the proposed foundations of the trackway. At 4.6 metres width with a depth of 1 metre, tree roots may be negatively impacted by the proposed engineering works, for which no assessment has been made. A survey may illustrate that alternative engineered details are required and should thus be produced prior to determination to either establish that there will be no harm to the trees along the route or that an alternative engineering solution needs to be designed. Based on the potential harm to a number of mature trees along the route, the application cannot be supported and fails to comply with Local Development Plan Policies 8, 11 and 15.

### **Ecological Impacts**

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'*

The PCNPA Ecologist has made the following comments:

### **Extended Phase 1 Survey**

"An Extended Phase 1 survey was completed on the 9<sup>th</sup> November 2016 by Soltys Brewster and the findings of this have been summarised in the Ecological Appraisal, dated 6 December 2016.

The survey concluded the proposed route is predominantly of low ecological value utilising existing tracks or over amenity and species poor grassland. Several trees were identified as having moderate to high potential for bat roost features and the surrounding hedgerows and woodland habitat was confirmed as being of importance for commuting and foraging bats. The site was also assessed to have likely presence of reptiles and high levels of breeding birds.

Confirmation is required to establish if the trees identified as having moderate to high potential are to be retained or removed as part of the proposed development. If they are to be removed further activity surveys will be required prior to determination to assess levels of use, species present and produce a suitable mitigation strategy.

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**Bat Surveys**

No details of bat activity surveys have been included in this application however a summary was included in Volume II of the Environmental Statement submitted as part of NP/16/0677. Transect surveys of the route were undertaken in September 2016 and four static detectors left along the route between the 2<sup>nd</sup> and 7<sup>th</sup> September 2016. The surveys recorded the presence of *Myotis* spp, potentially Natterers, Greater horseshoe and Barbastelle bats.

No surveys were undertaken of specific trees that may feature roosting opportunities.

The survey report for the September surveys should be submitted prior to determination to allow us to assess the methodology, location of detectors and findings from the surveys.

**Designated Sites**

The ecological appraisal makes reference to nearby designated sites but does not consider the impact of the proposed development on 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 GHS and LHS bats and the GHS recorded during the surveys are likely to be associated with the SAC populations.

Further assessment is required to understand if the proposed route poses any detriment to the Favourable Conservation Status of the populations concerned.

We will require the information requested above prior to determination to allow us to fully consider the potential impact of the proposed scheme on European Protected Species and consider if mitigation or compensation is required" ..

Having regard to the lack of assessment 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 submitted for consideration and a HRA being carried out.

**Conclusion**

The principle of the land train proposal is considered to be broadly acceptable, although it is also considered the proposal could be made more sustainable by re-locating the car parking provision to within or adjacent to the Bluestone resort, removing the potentially significant impacts to the minor road adjoining Blackpool Mill.

However, the level of detail provided to date has been insufficient to ensure that there will be no harm to protected species, trees and landscape thus the application is recommended for refusal.



The application is intrinsically linked with the overall development of the Mill and surrounding land and in order to ensure that the land train operates as proposed and minimises the impact on the existing highway network a S106 agreement is required. A S106 has not been submitted with the application and given the significant impact the overall development could have on highway and vulnerable users safety without the security of the land train operation it is considered that the development would result in a detrimental impact on highway safety.

**Recommendation:** REFUSAL on the following grounds:

1. Insufficient information has been submitted in respect of survey work already undertaken, the impacts on nearby SSSI's and SAC's, and the potential wildlife impacts on trees impacted by the route. The application cannot therefore be supported and fails to comply with Policies 11 (Protection of biodiversity) and 15(Conservation of the Pembrokeshire Coast National Park) of the Pembrokeshire Coast National Park Local Development Plan (2010).
2. Insufficient information has been submitted in respect of a survey of trees which will be impacted by the proposed foundations of the trackway. At 4.6 metres width with a depth of 1 metre, tree roots may be negatively impacted by the proposed engineering works, the Local Planning Authority are unable to properly assess the impact on the trees without this information. . A survey may illustrate that alternative engineered details are required and should thus be produced prior to determination. Based on the potential harm to a number of mature trees along the route, the application cannot be supported and fails to comply with Policies 8 (Special Qualities), 11 (Protection of biodiversity) and 15(Conservation of the Pembrokeshire Coast National Park) of the Pembrokeshire Coast National Park Local Development Plan (2010).
3. In the absence of any S106 agreement the development will result in a detrimental impact on highway safety. The land train must be delivered prior to the beneficial use of the Blackpool Mill attraction proposed under (NP/16/0677/FUL). The application does not propose any mechanism to ensure this is achieved, therefore the proposed development is, therefore, contrary to Policies 52 & 53 of the Pembrokeshire Coast National Park Local Development Plan (2010).

bluestone  
national park resort

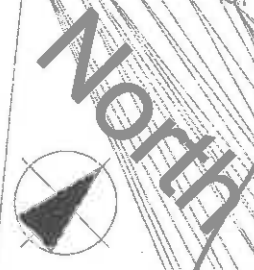
REVISIONS	DATE
P1 "Preliminary Issue" - issued for comment	28th November 2016
P2 "Preliminary Issue" - Client approval received	21st November 2016
A - Formal Issue for planning	25th November 2016
B - Section of Act 8.111 identified to meet legend updated	6th February 2016
C - Final layout updates to avoid tree wires to plan	21st February 2016

note for bollards see: revise update on legend

CAD FILE

NOTES

- LEGEND**
- Identifies existing access for emergency vehicles and waste water treatment plant.
  - Identifies proposed route for land train
  - Identifies low level bollard luminaire at 17.0 metre alternate intervals of land train route. Plan dimension 0.2 x 0.3m, height 0.5m. Size of bollard is NOT relevant to scale, and drawn for identification purposes only.
  - Identifies extent of cut/fill associated with road, based on a 35° batter from road edge to formation level.
  - Identifies vehicle control barrier on train route
  - Identifies pedestrian access route to Blackpool Mill (See separate application)
  - Identifies 50" (1280mm) chain link fence
  - Identifies 6" (150mm) timber close boarded fence with gate access for service vehicle
  - Identifies 24" (600mm) diameter raw water service pipe
  - Identifies 8" (200mm) diameter raw water service pipe
  - Identifies purpose built open cycle shelter to accommodate 20 bicycles
  - Identifies extent of plantation, "Diamond wood"



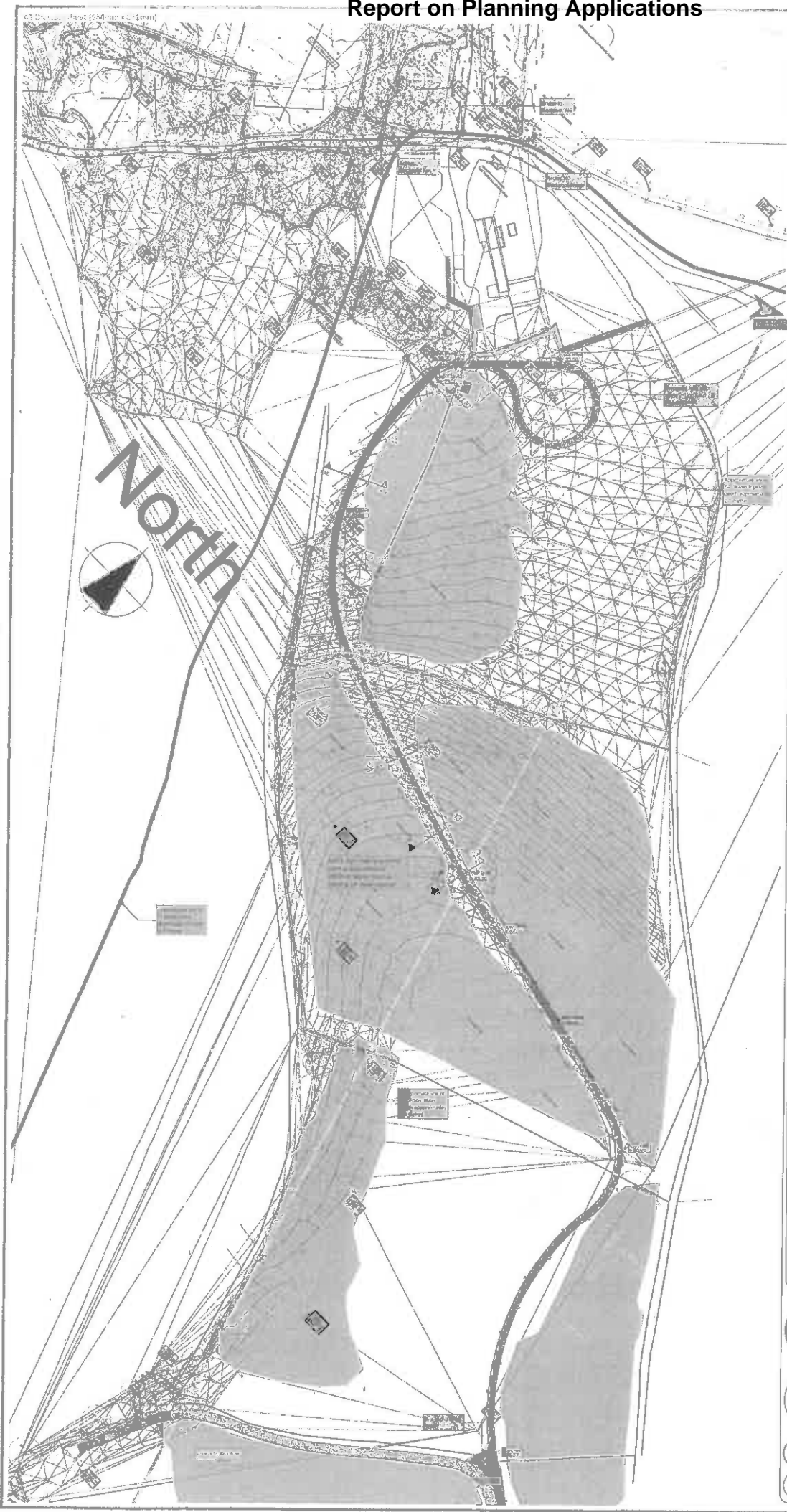
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Planning & Building  
National Park Authority  
22 FEB 2017  
Bluestone Park Development  
Report 5d

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Design file  
Planning Issue - Site Plan

2016  
Proposed Land Train Unit  
Resort and Blackpool Mill  
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## bluestone national park resort

REVISIONS	DATE
P1 'Preliminary Issue' - Revised for comment	14th November 2016
P2 'Preliminary Issue' - Client amendments	23rd November 2016
A - Formal issue for planning	27th November 2016
B - Train image replaced with Landrover Defender	15th February 2017
C - Site subject for road specification	21st February 2017

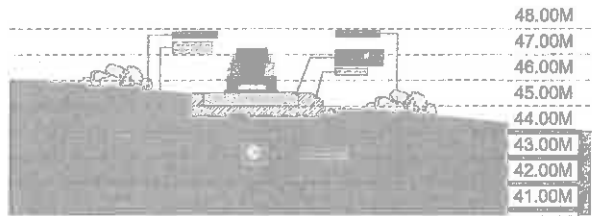
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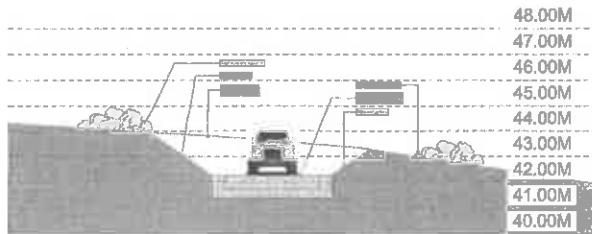
Road to be constructed as follows, subject to ground investigations and engineer's design -

1. Cut/Fill as applicable, if an fill there will be Tensar or similar reinforcement in layers at spacings to be agreed with the Engineer -
2. Tensar fabric laid deep to with 200mm of crusher-run laid on top
3. Filling with a layer of sub base 200mm deep and a topping of 100mm to dust as a finish
4. To both sides of the road there will be a stone surface water drain, to be laid to ground at agreed locations.

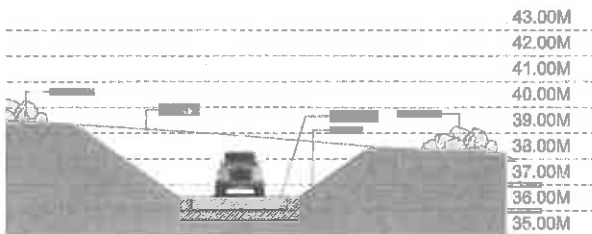
All the above will be finished after following out trial holes.



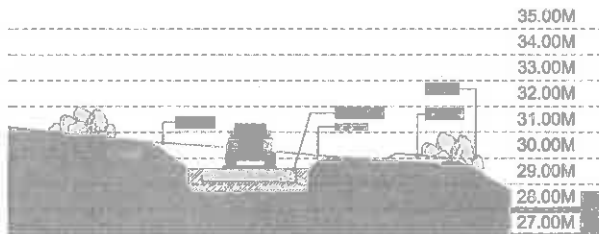
S-AA Site Section 1:100



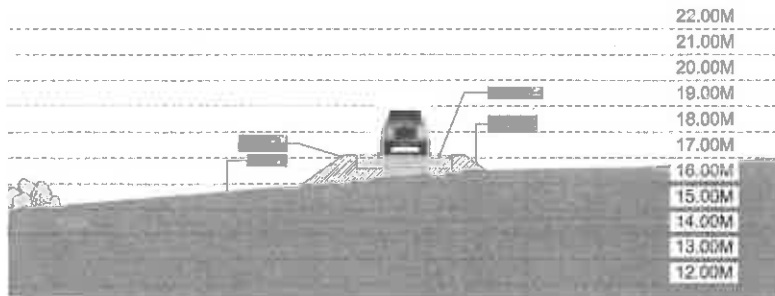
S-BB Site Section 1:100



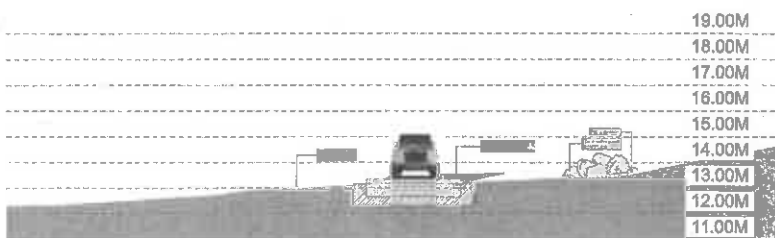
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S-DD Site Section 1:100



S-EE Site Section 1:100



S-FF Site Section 1:100

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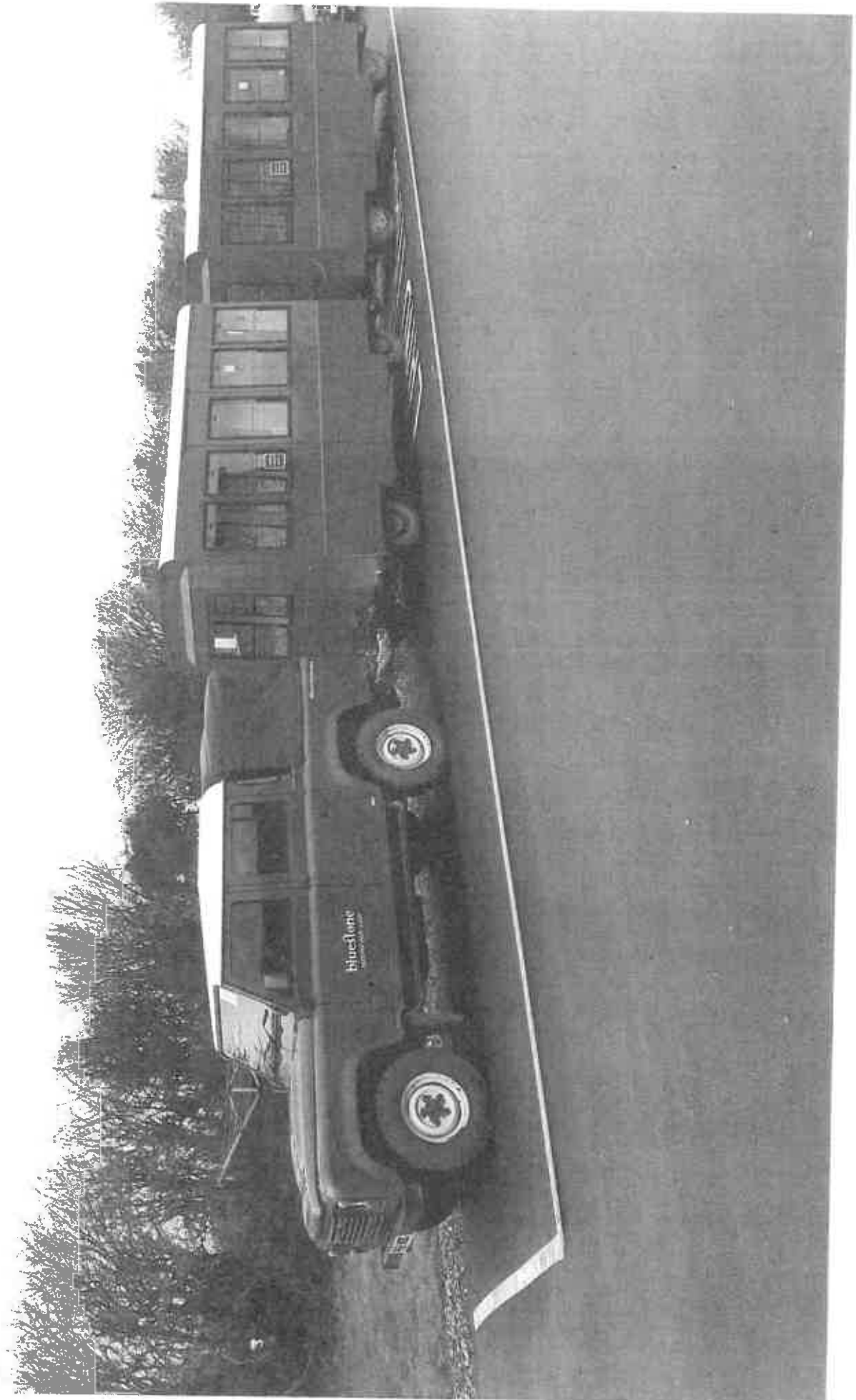
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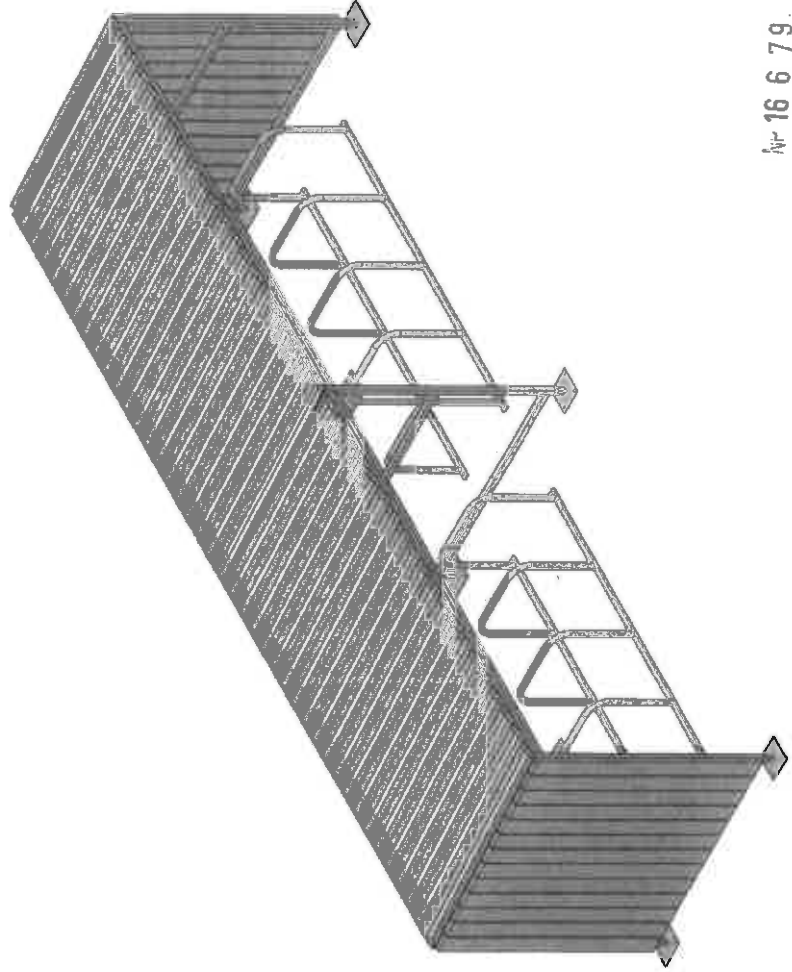
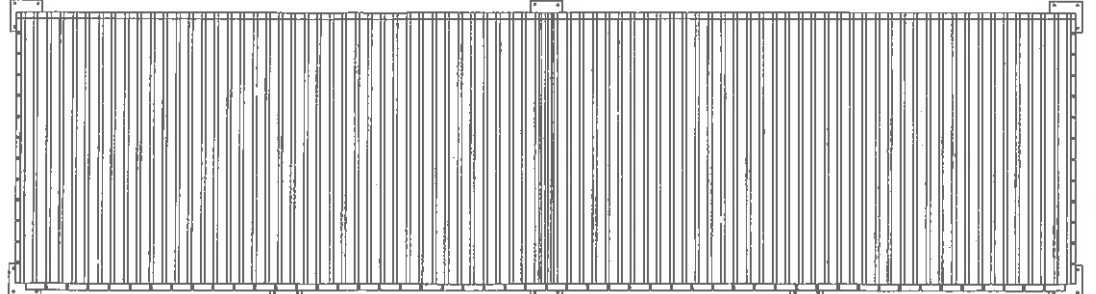
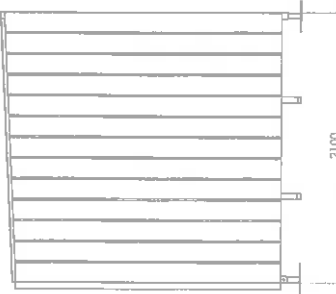
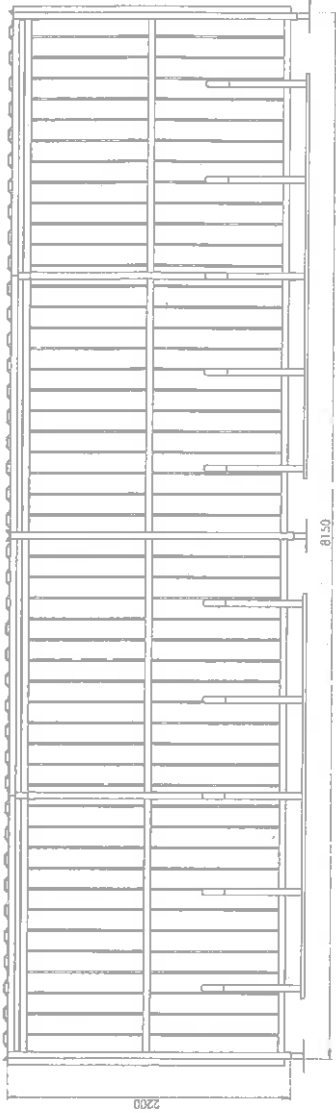
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Proposed Land Train for Resort and Blackpool Mill

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