Application Ref: NP/18/0335/FUL

Case Officer Andrew Richards **Applicant** Mr M Whitehouse

Agent Mr G Blain, Gerald Blain Ltd

Proposal Alterations to provide new access to the site, increase

site area & change existing 50 static caravans, 20 touring caravans and 30 tents into 91 lodge-style static caravans, new shop & reception area, new tractor shed, sales/display area for 2 units, staff & visitor parking area, new restaurant, areas for LPG storage and electricity transformer, minor alterations to existing road layout together with provision of new access roads within the

site and associated external works

Site Location Fishguard Bay Camping & Caravan Park, Fishguard,

Pembrokeshire, SA65 9ET

Grid Ref SM98323830

Date Valid 13-Sep-2018 Target Date 12-Dec-2018

The application is referred to the Development Management Committee for consideration as the application is a major development.

Consultee Response

Dinas Cross Community Council: No response received **PCNPA Tree and Landscape Officer:** Conditional consent **PCNPA Planning Ecologist:** Further verbal report to be given

PCNPA Park Direction: Policy refusal

PCNPA Estates Officer: No adverse comments PCNPA Access Manager: Conditional consent

PCC Transportation and Environment: Conditional consent and financial

contribution required for upgrading of highway

PCC Public Protection: Further verbal report to be given

PCC Drainage Engineers: Conditional consent and add informative

PCC Access Officer: Informative to be added

Natural Resources Wales: Additional information required Dwr Cymru Welsh Water: No comment and add informative

West Wales Trunk Road Agency: Further verbal report to be given

Public Response

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

A letter of support has been received from the local councillor.

Several letters of correspondence have been received which raises the following concerns/objections:

• Landscape impact

- LDP Policies 8 (Special Qualities) and 15 (Conservation of the Pembrokeshire Coast National Park)
- Loss of tent site and touring caravan pitches
- Transport impact
- Loss of flora and fauna

The above issues have been considered in the main report below.

Policies considered

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

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

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 21 - Minerals Safeguarding

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 31 - Minimising Waste

LDP Policy 32 - Surface Water Drainage

LDP Policy 34 - Flooding and Coastal Inundation

LDP Policy 35 - Visitor Economy

LDP Policy 37 - Self-Catering Development

LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW9 Chapter 03 - Making and Enforcing Planning Decisions

PPW9 Chapter 04 - Planning for Sustainability

PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW9 Chapter 07 - Economic Development

PPW9 Chapter 08 - Transport

PPW9 Chapter 11 - Tourism, Sport and Recreation

PPW9 Chapter 12 - Infrastructure and Services

PPW9 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

PPW9 Chapter 14 - Minerals

SPG05 - Sustainable Design

SPG06 - Landscape

SPG10 - Safeguarding Mineral Zones

SPG12 - Parking

SPG21 - Recreational and Leisure Activities

SPG22 - Seascape Character

SPG23 - Enabling Sustainable Development in Welsh NPAs

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 12 - Design

TAN 13 - Tourism

TAN 14 - Coastal Planning

TAN 15 - Development and Flood Risk

TAN 18 - Transport

TAN 23 - Economic Development

Constraints

CROW Access Open Country
Heritage Coast - within 100m
LDP Mineral Safeguard
Rights of Way Inland - within 50m
ROW Coast Path - within 10m
NPA Foreshore - within 25m
Potential for surface water flooding
Recreation Character Areas
Landscape Character Assessment
Seascape Character Assessment

Officer's Appraisal

Background and History

The host site forms a Camping and Caravan Park which is located on the coastal slopes overlooking Fishguard Bay with access to the site provided off the A487 Trunk Road that leads from Fishguard to Newport. The access road leading off the A487 is the U3425 unclassified road which leads down to the dwelling known as Penrhyn and the existing and proposed site accesses.

The existing site has consent for a mix of 50 static caravans, 20 touring caravans and 30 tents spread over a site area of some 2.75 hectares with a mix of the units interspersed throughout this site. There is also a main reception building which also accommodates other associated facilities for the site. Directly on the northern coastal edge are two further buildings which accommodate holiday let accommodation and a storage area.

- NP/02/476 Redevelop existing main amenity building Approved 02.01.2003
- NP/11/333 Patio's & decking to caravans & replacement of existing shed (Part retrospective) – Approved 13.10.2011
- NP/17/0699/FUL Alterations to provide new access to the site, increase site area & change all existing static caravans & touring caravans/tents to lodge style static caravans, new tennis court, new shop & reception area, new tractor shed, staff & visitor parking areas, new restaurant, minor alterations to existing road layout & detailed ecological enhancement & mitigation – Cancelled 28.03.2018

Current Proposal

Planning approval is sought for alterations to provide a new access to the site, increase site area & change existing 50 static caravans, 20 touring caravans and 30 tents into 91 lodge-style static caravans. In addition the proposal includes a new shop and reception area, new tractor shed, sales/display area for 2 units, staff & visitor parking area, new restaurant, areas for LPG storage and electricity transformer, minor alterations to existing road layouts, together with provision of new access roads within the extended site area and associated external works.

Key Issues

The application raises the following planning matters:-

- Policy, Visual Amenity and Special Qualities of the National Park
- Amenity and Privacy
- Highway Safety and Access
- Landscaping
- Biodiversity
- Land Drainage and Flooding
- Other Material Considerations

Policy, Visual Amenity and Special Qualities of the National Park:

One consultation response letter refers to the site and concerns on the development not being in accordance with LDP policies 8 (Special Qualities) and 15 (Conservation of the Pembrokeshire Coast National Park).

The proposal seeks to replace the permitted 50 static caravans, 20 touring caravans and 30 tent pitches into 91 lodge-style static caravans units and to increase the site area by some 67% into adjacent agricultural land which also forms part of the prominent coastal slope.

Policy 38 of the Local Development Plan seeks to retain the status quo in terms of caravan and camping provision. Exceptionally site areas may be enlarged where this would help to achieve environmental improvement. Unrelated improvements such as providing additional facilities or upgrading caravan provision will not be expected. Any increases in site size would be to achieve environmental enhancement through reducing density or allowing for additional landscaping. The policy is clear that an increase in the number of pitches will not be permitted.

The site is in a prominent and exposed location. The Authority has adopted Supplementary Planning Guidance on Landscape Character and the site with located within character area 24. The area is described as being a settled, peaceful landscape (except for the main road) and dominated by pastoral agriculture fields. A distinct sense of place is derived from the extensive coastal views. It is noted that agricultural changes such as increased field sizes and the introduction of non-traditional farm buildings are impacting negatively on the landscape. It is advised that the siting, layout and construction materials of future development should be in keeping with the existing character of traditional built-form.

The Authority also has a complementary Supplementary Planning Guidance document on Seascape Character. The site is within Character Area 6. The existing Fishguard Bay Caravan Site (Penrhyn) is cited in the document as a prominent feature on the coastal edge.

It is described as:

"a prominent detractor to the feeling of remoteness and naturalness."

The document identifies that development pressures will impact on the coastal splendour, remoteness, tranquillity and wilderness and the space to breathe in this Character Area.

Policy 1 of the Local Development Plan is based on National Park Purposes and sets out that development in the National Park must be compatible with conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park – and the public understanding and enjoyment of those qualities. When considering applications the Authority has a duty to consider the economic and social well-being of communities provided it is compatible with the statutory National Park purposes.

Policy 8 of the Local Development Plan is intended to protect the Special Qualities of the National Park – including the sense of remoteness and tranquillity and development of the undeveloped coast.

Policy 15 of the Plan protects the qualities and special character of the National Park by resisting development that would:

- a) Cause significant visual intrusion
- b) Be insensitively or unsympathetically sited within the landscape
- c) Intensify a use incompatible with its location
- d) Fail to harmonise with or enhance the landform and landscape character of the National Park.

The prominent location of the existing caravan site within the landscape is already noted. The proposals would create an even greater significant visual impact and would extend development along the undeveloped coast. It must be acknowledged that the Pembrokeshire Coast National Park is the only National Park in the UK to be designated primarily for its coastal landscape. The intensification of the use of both the existing site and the site extension through the additional permanent static caravan units would be contrary to the above policies seeking to control such

developments. Furthermore the need to protect the undeveloped coast is fortified in Planning Policy Wales (Edition 9, November 2016) (para 5.7.2).

In preparation for the Local Development Plan Review, the Authority commissioned a study to consider the capacity of the National Park landscape to absorb camping and caravanning developments. The study was based on the Landscape Character Assessment areas. This report acknowledges that further development in Landscape Character Area 24 in more open or exposed sites would affect the mainly unspoilt and undeveloped character of the coast. New sites should not be inter-visible from the sea and coast. It also identifies that there are no situations where there may be a benefit in extending sites without an increase in accommodation – let alone including an increase in accommodation. The mitigation guidance to the Authority includes removing static caravans from prominent locations and at the coast.

The proposal includes some additional landscape detail. However in an exposed location such as this, with plants exposed to salt-laden winds on an exposed landscape, there is little opportunity for effective mitigation. On the coastal slopes the landscaping can also add to the detraction as it combines with the development to present an unnatural and developed feature within a wider undeveloped landscape. Thus the proposed landscaping and ecological enhancement would not be sufficient in this instance to overcome the significant policy objections to the principle of extending this prominent site.

Policy 9 of the Plan relates to light pollution. The agent has advised that a 'light curfew' would be imposed at night between 2300 and 0400. Whilst this may be controllable for external lighting, it would not be possible to enforce such a condition for the internal lighting within the lodge style static caravans. The scale of the proposal has the potential to significantly increase the level of light pollution to the detriment of the special qualities of the National Park and would be contrary to this policy.

The tourism impact assessment makes reference to staffing and job creation, suggesting a 381% increase in the number of full-time equivalent posts. It is not possible, however to test the accuracy of such estimates at the planning application stage. Planning policy Wales requires the planning system to support economic and employment growth but alongside social and environmental considerations and within the context of sustainable development.

Authorities are required to ensure that the economic benefits of proposals are understood and given equal consideration with social and environmental issues in the decision-making process. In rural areas the expansion of existing businesses located in the open countryside should be supported where there are no unacceptable impacts on local amenity.

In this instance the impacts of the proposal on the National Park landscape and its special qualities are significant and the creation of 21 additional full-time equivalent posts is insufficient to outweigh the identified concerns which cannot be mitigated in this location.

The Sandford Principle states that the first purpose of National Parks is the preservation and enhancement of natural beauty. The second purpose is the promotion of public enjoyment. Where there is conflict between the two purposes priority must be given to the preservation and enhancement of natural beauty.

The location of the site in the countryside would also generate additional trips for employees living in nearby settlements. The nearest bus service operates along the A487. The single track road to the site from its junction with the A487 is 1.12km and therefore in excess of the 1km maximum distance the Authority considers reasonable as a walking distance to facilities and services – as set out in the adopted Accessibility Supplementary Planning Guidance. The access road from the A487 is unlit and the location exposed. It is also a single track road with no footway and there is therefore substantial potential for vehicle and pedestrian conflict. The distance and these characteristics make this a very unattractive walking route.

The majority of the new jobs cited in the supporting documentation to the application are in the hospitality element and thus has potential for working during hours of darkness. It is therefore highly likely that the only reasonable means of reaching the site would be by car. This is contrary to the Welsh Government's main sustainability objectives which are to reduce car use.

Amenity and Privacy:

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

The application proposes a development which would generate some amount of noise. The noise associated with the new development would be year round. Some increase in noise from the current levels would be expected. However, this noise would be similar to residential noise and is not considered to generate an unacceptable level of noise in this instance.

The application site has a residential dwelling located immediately to the south east. Hedge banks and tress are located between the application site and the nearby residential property. In respect of privacy, given the distance between the site and the nearby residential property and the partial screening provided by the existing landscaping and buildings, the proposed development would not give rise to any concerns in respect of privacy.

Highway Safety and Access:

One consultation response letter refers to the site and concerns on transport impact from the development.

Pembrokeshire County Council Transportation and Environment section indicate that there is no objection from the Highway Authority to the principle of the new access, and no objection to the layout of the on-site roads, the location of the new buildings, or the proposed static caravan plots. A detailed plan of the access is required as a pre-commencement condition, and the access crossing of the Highway verge needs

to be licensed by the County Highway Authority Street care section and a note will be added to any consent granted to cover this aspect.

There is concern about the condition of the Unclassified Road (U3425 Penrhyn Road) leading to the site. The site entrance will still be 950 metres from the junction with the Trunk Road A487, even though the last 170 metres past the group of dwellings at Penrhyn will be bypassed, and over this distance there is already deterioration of the surfacing of the verges, and also to the edges of the carriageway, where vehicles pass one another. There is a need to upgrade rough stone and muddy passing areas before any part of the new development is open for business.

There is a need for a Road Condition Survey to ensure any damage caused by the development can be specifically attributed to the construction period for the new development. Due to the future traffic increase additional works will need to be carried out to upgrade the surfacing on the passing places along the Unclassified Road. There will be a significant number of heavy goods vehicles bringing in the large static caravans and lodges during the early months and years of operation.

Once the units are occupied there will be an incremental increase in day-to-day movement of cars, based upon the increase in pitch numbers. It is believed that even the removal of the touring caravans visiting the touring pitches will not mean a reduction in towed vehicles, as there could be a similar number of towed boats on trailers. As such, the proposed development is considered to have the potential to increase the overall traffic movements into and from the site.

Therefore, subject to the cost of the repairs, this is £10,000 as a transportation contribution under the terms of an associated Section 106 Planning Agreement to current proposal would be considered to be acceptable and subject to planning conditions relating to details of the new access, highway condition survey and appropriate repair.

However, no legal agreement has been submitted to date and this would form a reason for refusal. This request has not been put to the applicant as the recommendation is for refusal and it would be unreasonable to put the applicant to expense when the principle of the development is not acceptable.

The West Wales Trunk Road agency has been consulted and a formal response has not been received to date. A further verbal report will be given to members on this aspect.

Landscaping:

The existing site has a mixture of mature trees and traditional Pembrokeshire hedgebanks along its boundary which will be retained as part of the proposed scheme. The proposal also seeks to retain areas of soft landscaping within the existing site and provide additional landscaping on this site and the new site areas in the form of new hedgerows, hedging, scrub and tree planting to assist is providing partial screening from the wider landscape.

However, given the nature of the existing sparse landscape at this location along this stretch of coastal slope, it is considered that the new planting proposed in this

instance would add a harmful landscape feature which would result in a significant adverse change to the coastal splendour, remoteness, tranquillity and wilderness of this stretch of coastline.

As such, whilst the new landscaping would assist in general terms for partial screening of the new site and the new structures proposed, views into the site from the wider landscape and seascape taking account of the new landscaped areas in combination with the small copse of tress located to the south east of the site would result in this small area becoming heavily landscaped. This proposed landscaping would when compared to the existing sparsely landscaped coastal slope that is flanked by craggy outcrops be considered to be adding landscaping features into an area which will result in a significant landscape character change to the detriment of this area of the National Park.

Therefore, whilst the application proposes approximately 200 new trees and additional soft landscaping features throughout the existing and new site areas, the existing landscape character is not considered in this instance to be able to accommodate this proposed development together with its associated landscaping.

Biodiversity:

One consultation response letter refers to the site and concerns on the development resulting in the loss of flora and fauna.

PPW, TAN5 and LDP policy 11 requires biodiversity and landscape considerations to be taken into account in determining individual applications.

The site for the proposed development extension which are currently three separate fields are of high ecological value and have previously been managed as three different habitats; a fine example of species-rich grassland/hay meadow in the northern field, previously rhos pasture in the eastern field and steep brackendominated slopes in the western field. There is a concern that the proposed development would result in the loss of these valuable habitats if the development is not undertaken sensitively. The proposed development in its current form would make conservation management very difficult and it is likely these valuable habitats would be lost.

The historic management of these fields ceased some 4-5 years previous. The ecologist acknowledges that the northern field would improve under the correct management regime and that any bramble/bracken encroachment could be rectified. It is noted that the field still offers potential as good quality habitat and with the correct management this site could return to being flower-rich, rich in invertebrate life and offer good quality pollinator habitat. The same is applicable to the eastern field, which since the historic management has ceased has lost much of its value as rhos pasture.

Although the quality of the fields has declined recently the ecologist considers that it could be returned to high value, good quality and important habitat for invertebrate and pollinators. This was a rare example of flower rich and rhos pasture and the current proposed development would result in the loss of areas of high value.

An updated ecological report covering the three fields has been received and a further verbal report will be given to members on this aspect.

Land Drainage and Flooding:

Pembrokeshire County Council Drainage Engineers have been consulted as part of the application and support the application subject to the discharge of surface water from the new structures being directed to new soakaways or other form of sustainable drainage system. If, however, ground conditions are not suitable for the use of soakaways/infiltration type SuDS, an alternative method of disposal will be required, which should be agreed in writing with the local planning authority.

It is also noted that the any impermeable surfaces created as part of the development should ensure that surface water runoff should be disposed to soakaways or other forms of SuDS.

Ordinance survey mapping indicates the presence of ordinary watercourses within the perimeter of the site. The applicant will need to be made aware that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without approval. In addition any existing watercourses, drains, ditches and outfalls which are disturbed by the proposals will need to be suitably intercepted and redirected, to ensure that the existing local drainage network is not adversely affected. An informative would cover this aspect.

Other Material Considerations:

One consultation response letter refers to the loss of tent and touring caravan pitch provision resulting from the proposed move over to static caravan style pitches throughout this site. It is noted that there are many sites within the National Park that only offer one specific provision of unit pitch type within their sites. The LDP does not specifically relate to this aspect directly and is difficult to suggest that this is a material consideration of significant weight. In this instance the proposed change will result in adverse visual, landscape, transport and biodiversity impacts that are of much greater weight than any concerns raised on the loss of different pitch options within the site.

Pembrokeshire County Council Public Protection section has also been consulted and no response has been received to date. A further verbal report will be given to members on this aspect.

Conclusion

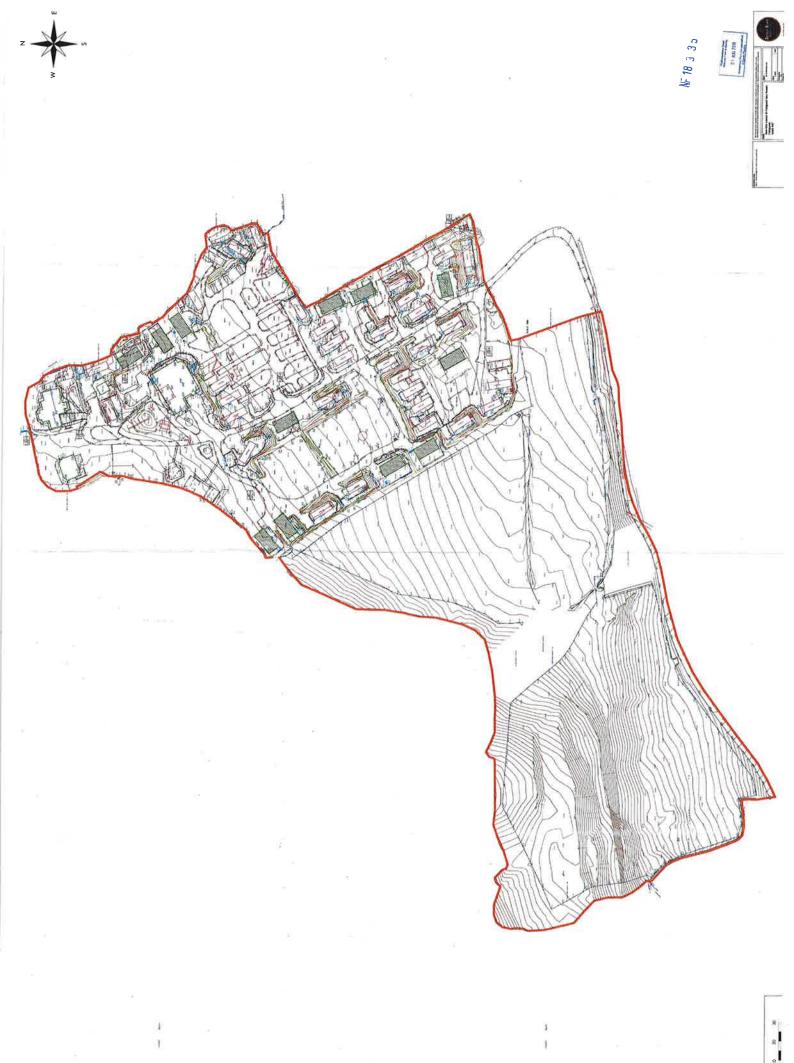
There are significant national and local policy objections to this application which are not off-set by the proposed landscaping and environmental enhancement. The impact on the National Park landscape and its special qualities are significant and increasing the level of landscaping is likely to do little but increase the visual impact in this exposed location. The economic considerations have been taken into account but do not have sufficient weight to counter the overall environmental objections to this proposal.

Recommendation

A further verbal report will be given to members at the committee meeting in respect of Ecological, Trunk Road Access and Public Protection matters.

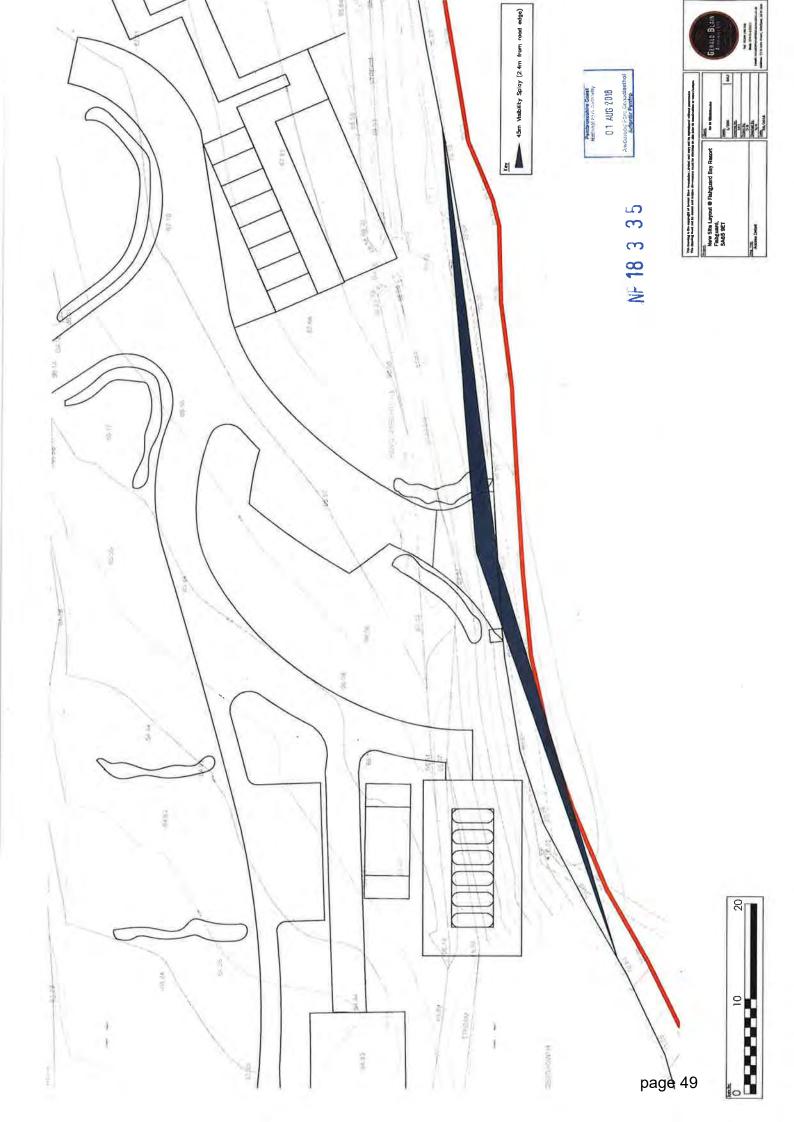
REFUSE, for the following reason(s):

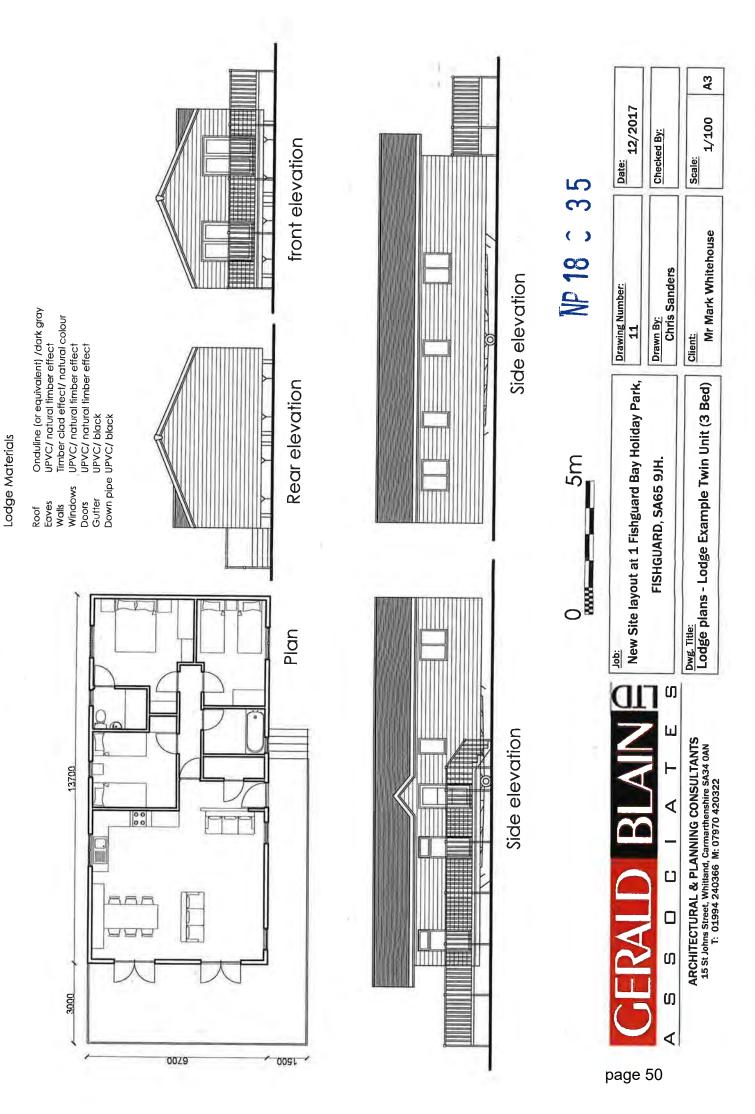
- 1. Policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan state extension to existing holiday sites will not be permitted in the National Park. The additional 41 lodge-style static caravans and their associated development in an open countryside location is therefore contrary to adopted Local Development Plan Policy.
- 2. Policies 1, 8, 9, 15, and 30 of the Pembrokeshire Coast National Park Local Development Plan seek to protect and enhance the pattern and diversity of the landscape, and prevent development that fails to harmonise with or enhance the landform and landscape character of the National Park, that fails to incorporate traditional features, and that is insensitively and unsympathetically sited within the landscape and visually intrusive. The proposed development forms a visually intrusive and discordant addition to this rural area that is harmful to the special qualities of the National Park and therefore contrary to policies 1, 8, 9, 15 and 30 of the adopted Local Development Plan Policy and Supplementary Planning Guidance on Landscape Character Assessment and Seascape Character Assessment.
- 3. Insufficient information has been submitted in respect of highway repairs and improvements in the form of a legal agreement to allow the local planning authority to properly mitigate against 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).











Onduline (or equivalent) /dark gray UPVC/ natural timber effect

Roof Eaves

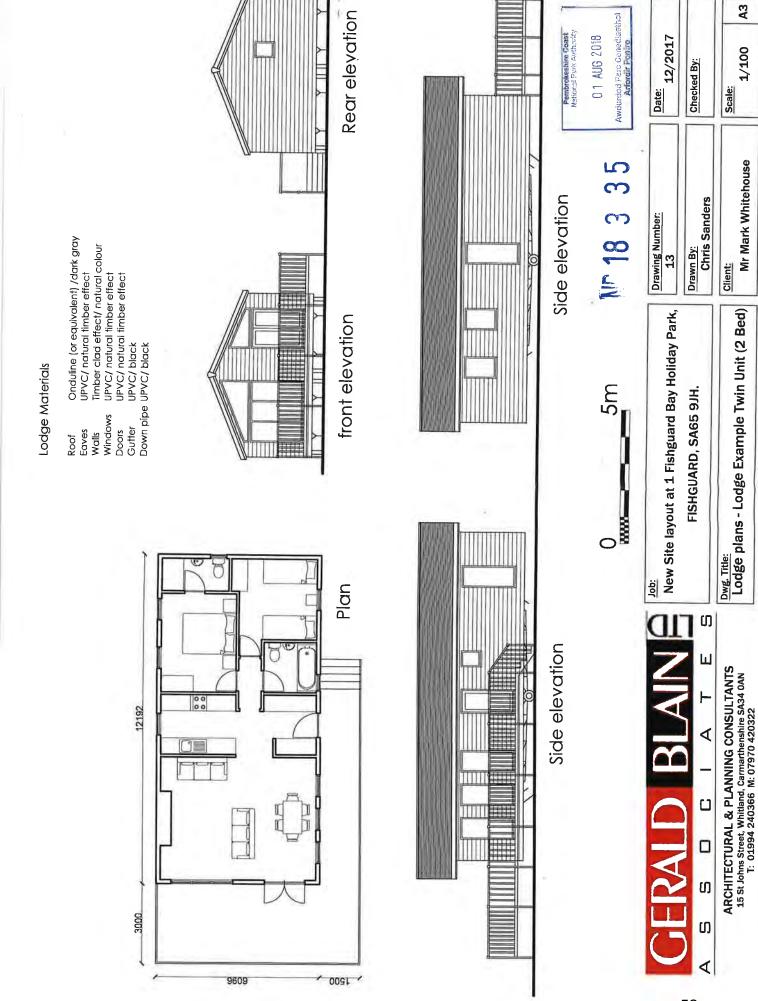
Lodge Materials

page 51

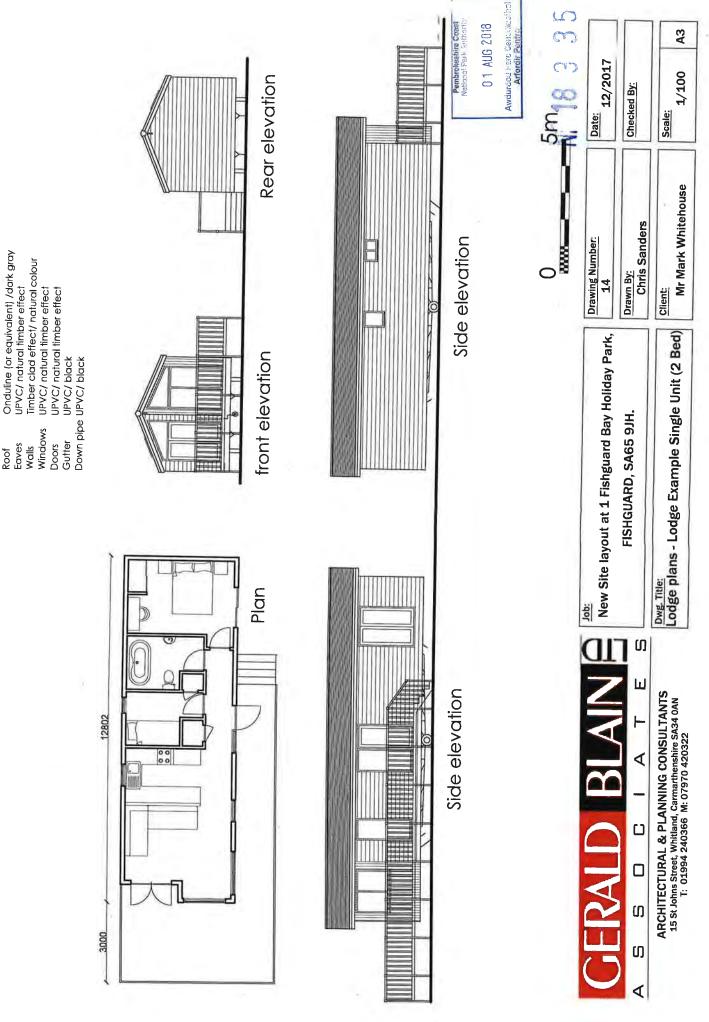
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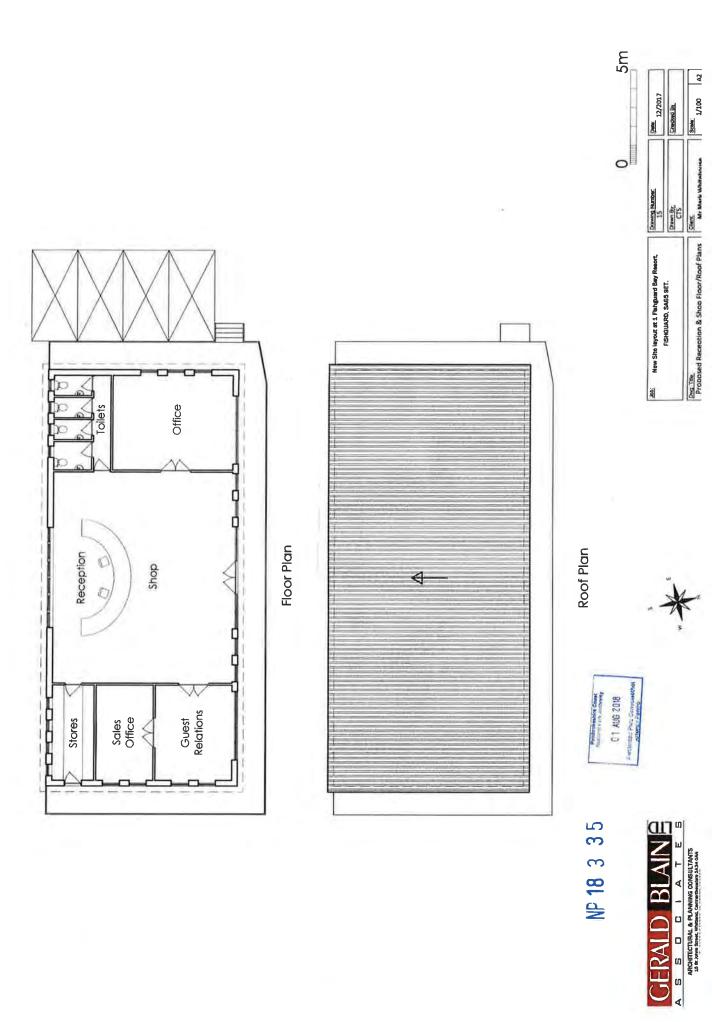
Mr Mark Whitehouse

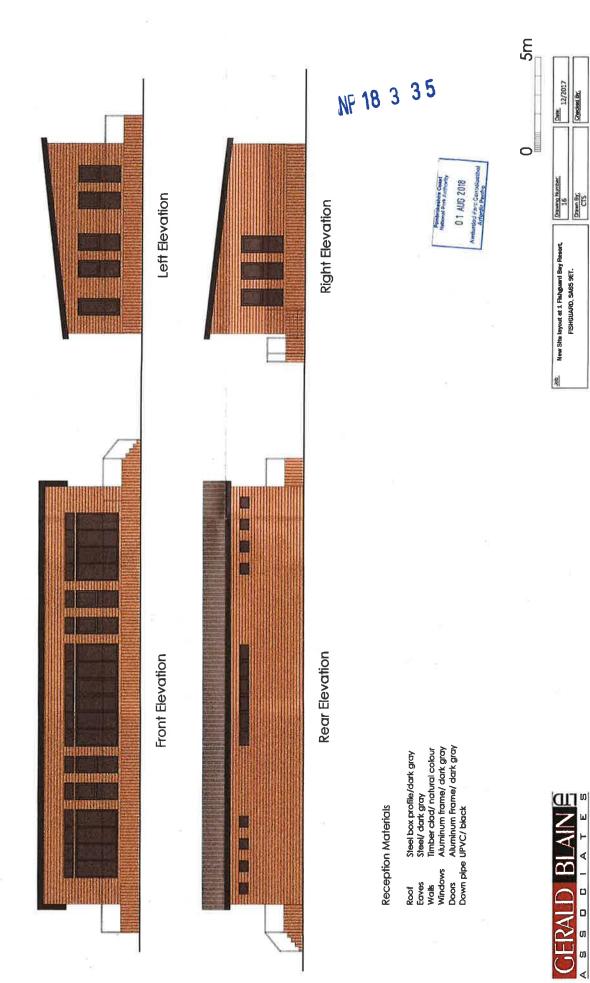


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Lodge Materials

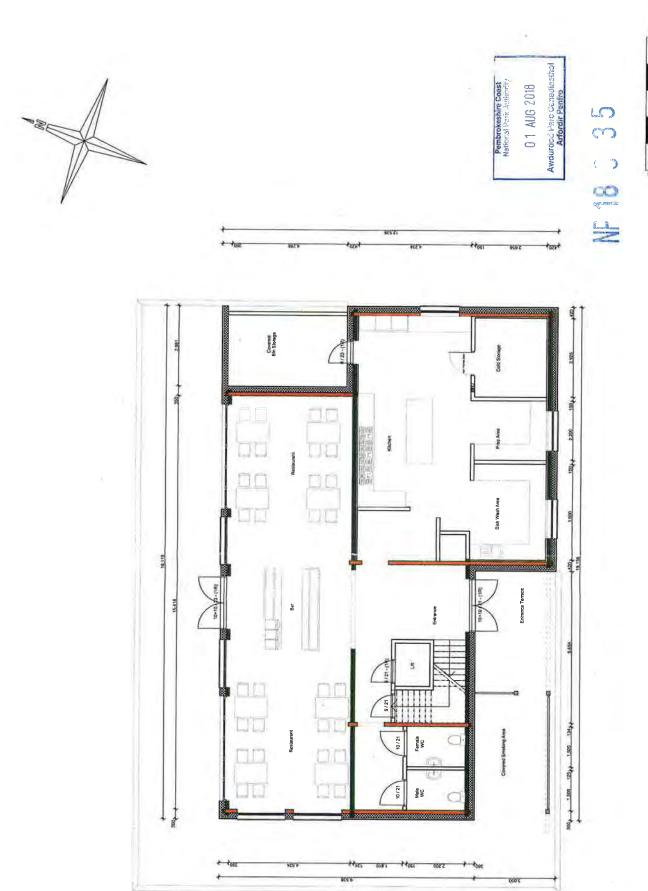




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Ong Tab. Proposed Reception & Shop Elevations

ARCHITECTURAL & PLANNING CONSULTANTS



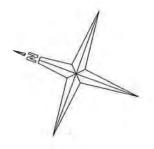


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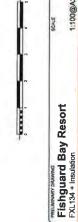
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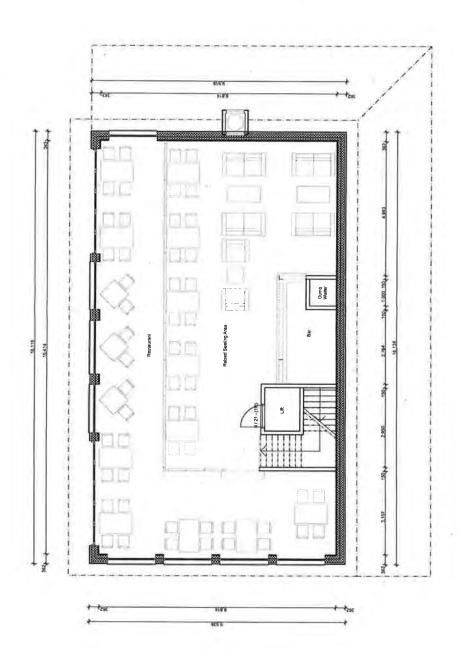




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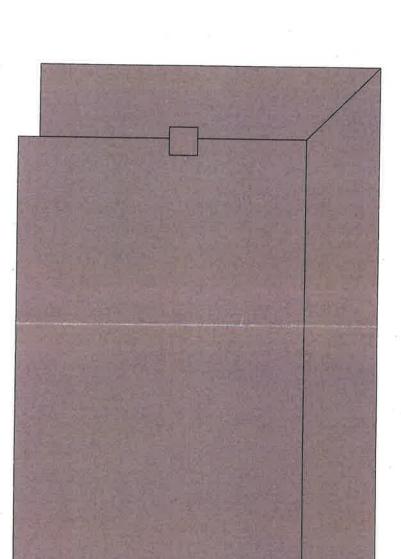




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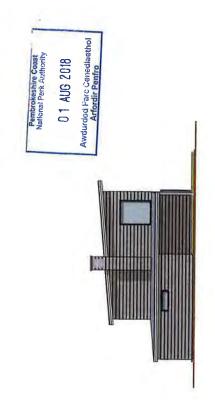


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External Finishes
Horizontal FXL log panelling to walls - Colour TBC
Sarnafil single ply membrane roof covering - Colour TBC
Aluminium clad powder coated windows and doors in Anthracite grey
Timber fascia & barge boards - Colour TBC





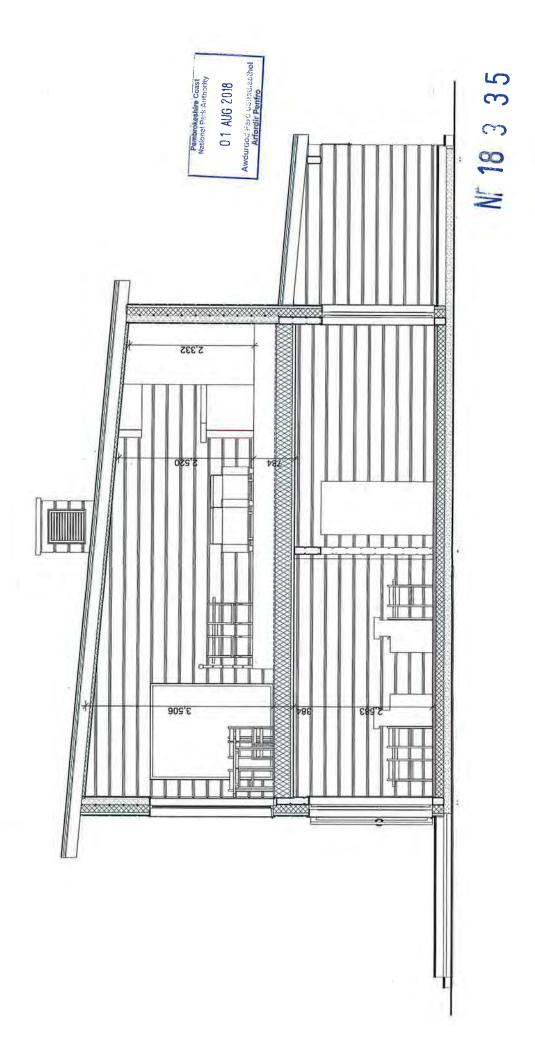


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3D View

DATE 06.03.2017

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Fishguard Bay Resort FXL134 + Insulation

