Application Ref: NP/17/0691/FUL

Case Officer Nicola Gandy **Applicant** Mr D Brown

Agent Mr G Blain, Gerald Blain Ltd

Proposal 16 residential units, replace 85 tents & tourer pitches

with 85 static caravans, sewerage pumping station &

associated landscaping

Site Location Buttyland Caravan & Camping Park, Manorbier, Tenby,

Pembrokeshire, SA70 7SX

Grid Ref SS06869913

Date Valid 20-Nov-2017 Target Date 15-Jun-2018

The application is reported to the Development Management Committee for determination as the application is a major development.

Consultee Response

Manorbier Community Council: Object to the application due to over development

and lack of traffic impact assessment **PCNPA - Ecologist:** No objection

Dwr Cymru Welsh Water: Conditional Consent

PCNPA - Tree and Landscape Officer: Conditional Consent

PCC - Drainage Engineers: Conditional Consent Dyfed Archaeological Trust: No comment

PCC - Transportation & Environment: Conditional Consent

PCC Waste: Advised on waste requirements

Public Response

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

Letters of objection were received from 2 local residents. The material objections are summarised below and full copies of the objections are available to inspect on the application file:-

Contrary to LDP policy

Impact of caravans and pumping station on landscape

Need for affordable housing

There is only planning permission for 35 caravans and 15 tents

Traffic increase and highway safety

Impact on the school

Viability of the proposal is lacking

No draft S106 agreement

Use of static caravans as permanent residents

Sewer capacity

Design Density

Sustainability of location

Light pollution

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Landscaping
Lack of amenity space
Noise
Query in relation to the school occupying the land

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

- In respect for the need and amount of affordable housing, Planning Policy Wales states that:
 - ..'A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers'. This development would meet a proven need for affordable housing to serve the Community Council area.
- In respect of the concern in relation to light pollution, if the application were recommended for approval it would be subject to a condition requiring a lighting scheme to be submitted to and agreed in writing by the local planning authority.
- The most recent Pembrokeshire County Council's Admissions to Schools Information confirms that there is capacity for 86 pupils, with the current number on the roll being 56. The development would, therefore, not be considered to result in additional pressure on the local school.
- In respect of the school occupying the land, the Local Planning Authority is not aware of any such proposal.
- If the caravans were considered acceptable a condition would be attached to any permission granted to ensure that the caravans are not used as permanent residences.
- The majority of the proposed properties are to be provided by a registered social landlord who would assess the viability of a scheme prior to progressing it.

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 06 - Rural Centres

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

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LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 32 - Surface Water Drainage

LDP Policy 35 - Visitor Economy

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

LDP Policy 39 - Upgrading Statics, Touring Sites and Tent Pitches

LDP Policy 44 - Housing

LDP Policy 45 – Affordable housing

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW9 Chapter 04 - Planning for Sustainability

PPW9 Chapter 07 - Economic Development

PPW9 Chapter 08 - Transport

PPW9 Chapter 11 - Tourism, Sport and Recreation

SPG06 - Landscape

SPG08 - Affordable Housing

TAN 02 - Planning and Affordable Housing

TAN 12 - Design

TAN 13 - Tourism

Constraints

LDP Allocation

LDP Mineral Safeguard

Historic Landscape

Potential for surface water flooding

LDP Centre:50pc aff housing;30 units/ha

Recreation Character Areas

Landscape Character Assessment

Officer's Appraisal

Description of Development and Site

The application seeks planning permission for the following:-

- 14 No. Affordable housing units
- 2 No. Open market houses
- Upgrading of existing caravan park from 70 seasonal touring pitches and 15 tents pitches to 85 static caravans
- New sewage pumping station

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

The proposed 2 open market dwellings will comprise 2 No. 2 bedroom bungalows with associated car parking and gardens. Access to the site will be gained via the entrance to the 14 affordable houses off Station Road.

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

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

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

Relevant Planning History

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

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

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

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

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

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

NP/17/171/NMA – Non material Amendment – Increase in height of building – Withdrawn 6th April 2017

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

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

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

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

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

Key Issues

The application raises the following planning matters:

- Policy and Principle of the Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity
- Highway Safety
- Biodiversity
- Drainage

Policy and Principle of the Development:

The application proposed a mixed development with two main elements, housing and the redevelopment of the caravan park to accommodate 85 year round static caravans.

Housing:

The application site is partly located in Manorbier Station - a defined Rural Centre within the Local Development Plan (LDP), the application site forms part of an allocated site for mixed use purposes as part of the strategic aims of the Plan. The aims of Policy 6 – Rural Centres are to a) to meet the housing, in particular affordable housing needs, b) to encourage small scale employment developments and c) to protect and enhance the Centre's range of facilities.

The application site is partly located on an allocated site for a mixed use development (Allocation reference: MA895). The proposed use for the whole allocation is for residential (15 units) and educational purposes. The application proposes to a mixed use of residential and tourism, as the site is already used as a caravan park it is considered that the development is in accord with the allocation.

Policy 45 – Affordable Housing requires the provision of affordable housing units on each allocated site. In this instance the required affordable housing contribution amounts to a provision of 45% on site contribution , however the development proposes 87% of the housing proposed to be affordable, as such , the development is considered to comply with Policy 45 of the LDP and the Authority's Supplementary Planning Guidance on Affordable Housing (November 2014). However, despite requests for a draft legal agreement to be submitted this has not been forthcoming, as such, the development is considered to be contrary to policy 45.

It is considered that the increase in density of the development is not significant, and that the housing element of the development – in principle – would be acceptably sited within the Rural Centre. The site is in close proximity to existing services and public transport serving larger Centres, as such, the additional residential units on the site can be supported.

Caravan Park:

The planning position for this site following the grant of planning permission in 1994 (NP/464/93) sets out that the site can lawfully accommodate 35 touring caravans

and 15 tent pitches not between the period of 10th January and 28th February in any one year.

In 2015 planning permission was granted for the winter storage of touring caravans on the site, where the housing is proposed, between the period of 10th January and 28th February in any one year.

A certificate of lawfulness was granted by the Authority in August 2013 (NP/13/0260 refers) which allowed the provision of an additional 35 touring caravans on the north field between March and September in any one year. The grant of a certificate for 35 touring units is not a permanent use of the land but is a material consideration. This results in a maximum of 70 seasonal touring caravans and 15 seasonal tents on the site during the months of March – September. Outside of these months there should be no more than 35 caravans at any one time. However, the Authority has recently served a Breach of Condition notice on the landowner as these numbers have been significantly breached.

Local Development Plan policies 35, 38, 39, and 41 deal specifically with caravan sites and the provision of amended or altered pitches.

Policy 38 makes clear that new camping sites or the extension of existing sites by an increase in the number of pitches or enlargement of the site area will not be permitted. It states, however, that 'exceptionally' static caravan and chalet sites may be enlarged where this would achieve an overall environmental improvement for the site and its setting.

Although the site is not being spatially enlarged, through the replacement of seasonal touring pitches to static caravans all year round it is essentially an increase in numbers throughout the year. The application makes little provision for environmental improvements, particularly the surrounding landscape, which is discussed in the Visual Amenity and Special Qualities of the Nation Park section of the report, as such the development is considered contrary to Policy 38.

Policy 39 is also applicable to the proposed development as it refers to the upgrading of 'touring sites'. Policy 39 states that the upgrading of touring caravan or tent pitches to other forms of self-catering accommodation will be permitted, where: a site lies within a Centre; and the proposal forms part of a rationalization scheme that will result in environmental benefits in terms of layout, design and materials used; and the proposal complies with policy 35 c).

The caravan site element of the application falls outside of the Rural Centre of Manorbier Station and, as such, is contrary to Policy 39. In terms of environmental benefits, whilst the application does propose some additional landscaping this is not considered sufficient to mitigate the visual impact of the 85 permanently sited static caravans or the pumping station proposed on the surrounding land, consequently the development is also contrary to policy 39 of the LDP.

There will be some internal environmental improvement to the caravan park itself as a result of the improved landscaping, but it has not been demonstrated that there would be an improvement to the wider setting of the site within the National Park.

Having regard to the above, the proposed development would be contrary to the requirements of the Local Development Plan policies 38 & 39. Consequently, the proposed replacement of 70 seasonal touring pitches and 15 seasonal tent pitches with 85 year round static pitches is contrary to policy and not considered acceptable.

Visual Amenity and Special Qualities of the National Park:

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

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

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

The application site lies within Landscape Character Area 04 Manorbier/Freshwater East as defined by the Landscape Character Assessment Supplementary Planning Guidance. The area's special qualities are listed in this document, one of which is as follows:-

'There is a very strong historical and cultural sense of place here, which is very different from that encountered in north and west Pembrokeshire, typified by the Medieval open field system which has survived remarkably well in the area - the strip fields which lie either side of the Ridgeway between Lamphey and to the south of St Florence. The wealth of historical and archaeological sites documented means that extensive areas of historic landscapes have an outstanding value attributed to them. Of particular note are the Medieval buildings: the Lamphey Bishop's Palace, a moated house site at Hodgeston and the extremely well preserved manorial landscape of Manorbier, with its imposing castle dominating the village scene, the prominent church and a dovecote.'

Notwithstanding the development being contrary to Policy 39 in that it is located outside a rural centre. In order to comply with the policies 38 & 39 significant environmental benefits to both the site and its setting in the surrounding landscape would have to be provided.

The application plans submitted provided limited information in respect of environmental improvements to the site, the master plan makes reference to a separate landscape plan which has not been submitted and increased screening around the site. The indicated landscape areas on the master plan are along the boundaries of the site, an area surrounding the proposed pumping station and 4 central areas. A separate Landscape Planting Proposal report has been submitted with the application, which indicates that the scheme will include a wildflower meadow, woodland and shrub planting and will ultimately result in a caravan site within a wooded park environment. The report states that once established the woodland and shrub areas will enhance biodiversity interest of the site.

Whilst the woodland planting is welcomed, it is not considered that the landscape plan goes far enough to provide significant environmental benefits as to make the scheme acceptable. The standardised layout of the park has little landscaping to break up the monotonous rows of caravans resulting in the park being a prominent permanent feature in the landscape year round without sufficient breaking up of the rows of static caravans, particularly when viewed from the north.

The case officer has met the applicant and the agent on a number of occasions and discussed what is required in respect of the environmental benefits, however further information has not been forthcoming.

Discussions have taken place in respect of the land to the south of the application site, within the ownership of one of the applicants. The applicant has indicated that he will enter into a S106 planning obligation to confirm that any permitted development rights will be removed from this parcel of land to ensure that it is not used as a temporary camp site under the 28 day rule. This would go some way to ensuring that the site does not expand beyond its current limits and reduce the impact on the surrounding landscape. However, a draft S106 planning obligation has not been submitted to the Authority.

The proposed static caravans will measure 12.76m in length by 3.64m in width and reach a maximum height of 3.24m. Each caravan will have a private deck area and will be finished with aluminum cladding, UPVC glazing, and onduline pantile roof. Limited information in respect of colours has been submitted, however, this detail could be addressed by a suitable condition. It is noted that the caravans proposed do not included any renewable energy features.

The development would result in 85 year round caravans which, due to their position, layout, design and materials will be highly prominent in the landscape when travelling from the Ridgeway, to the north, to the detriment of the special qualities of the National Park and the immediate visual amenities of the area.

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

In respect of the pumping station, the details submitted with this are limited in terms of the fencing and hard surfacing required, there is the potential that this could have a detrimental urbanizing visual impact on the rural character of the area. Again, the applicant has been advised that additional substantial landscaping is required in this area - a scheme has not been submitted.

Having regard to the above, the proposed development is considered to include insufficient environment improvements to mitigate against the impact of the proposed static caravans, adversely affecting visual amenity and the special qualities of the National Park, which is contrary to polices 8,15,35 & 38.

Neighbouring Amenity:

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 residential development which would generate some amount of noise, however, the residential noise associated with these 16 dwellings on an allocated site is not considered to be so significant as to warrant refusal of the application.

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

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

Having regard to the above the proposed development is considered to be acceptable in terms of amenity and to comply with policy 30 of the LDP.

Highway Safety:

The objections received raised concerns in respect highway safety.

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

In respect of the proposed housing and the pumping station entrance, the Highway Authority and have raised no objection to the development in terms of highway safety subject to a condition requiring detailed plans of the access roads.

Biodiversity:

Policy 11 refers to the protection of biodiversity, and requires that development that would impact on habitats and species will only be permitted subject to suitable mitigation. The application was submitted with an Extended Phase 1 Ecological Survey covering the entire site which found that there was likely to be no adverse impacts on protected species. The application has been assessed by the Authority's Ecologist who has no objection to the proposal.

Drainage:

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

The Drainage department at Pembrokeshire County Council was consulted as part of the application and has raised no objection to the proposal in respect of surface water drainage subject to a condition.

In respect of foul water drainage the application proposes a pumping station to the north western boundary of the site, which will be served by its own separate access, and will serve both the proposed static caravan site and the housing development. In

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order to ensure that this is provided by the developers at the appropriate stage of development a legal agreement is required with the input from Dwr Cymru/Welsh Water. Although the applicant has indicated that negotiations in respect of this matter have taken place the Authority has not seen a draft S106 Agreement that deals with this matter. Consequently, the application does not provide evidence that the site can be adequately served and the proposed development is, therefore, considered to be contrary to Policy 29 of the LDP in that the development is not well designed in terms of water and drainage.

Conclusion

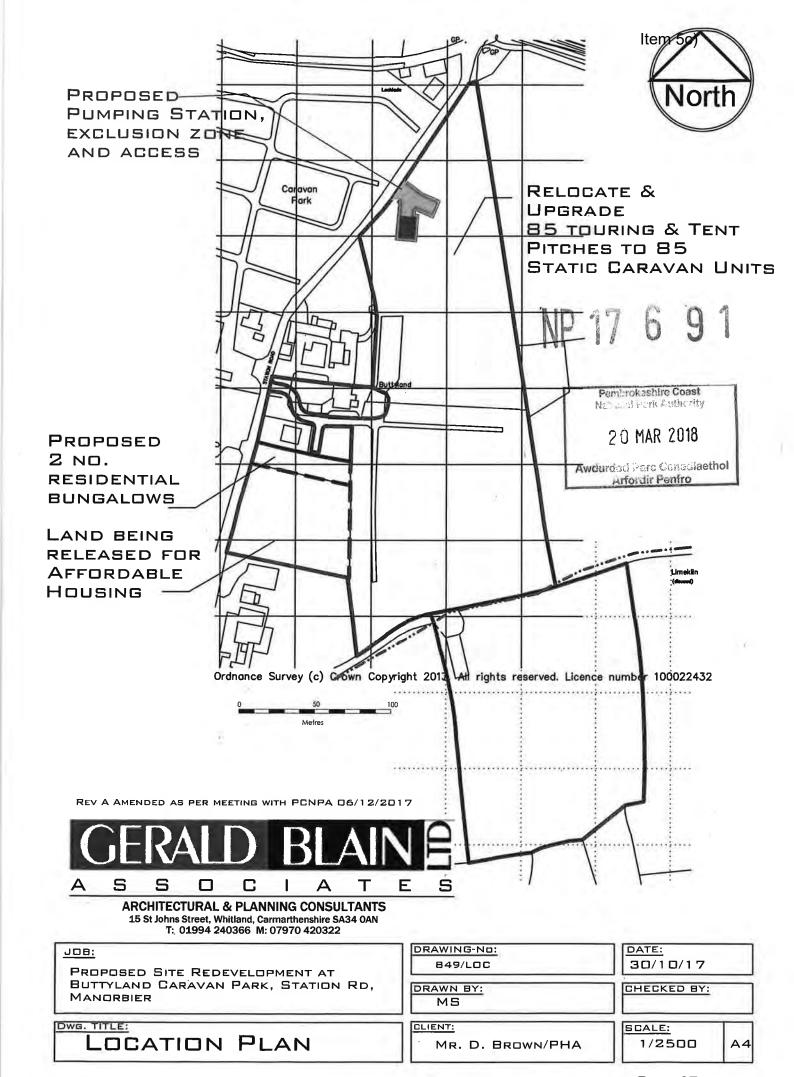
The proposed development has been considered against the policies of the adopted Local Development Plan and it is considered that the development would result in an insensitive and unsympathetic development within the National Park to the detriment of the rural landscape and the special qualities of the National Park.

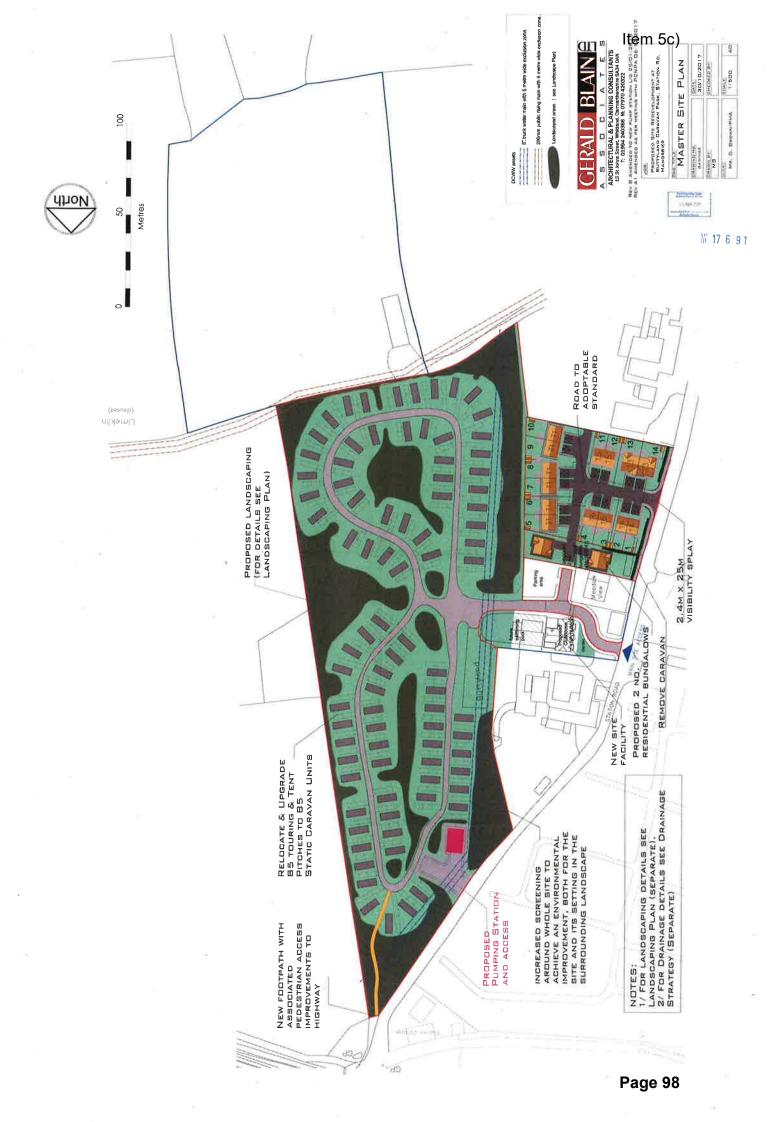
Whilst, certain elements of the development are acceptable, the proposed change from 85 seasonable touring and tent pitches to 85 year-round static caravan pitches is contrary to Policies 35 and 38 of the LDP which indicate that no extensions to existing caravan sites will be permitted unless there is environmental benefit, of which this scheme is lacking. No material considerations have been put forward which would be considered to outweigh the clear policy position set out the adopted LDP, regarding such developments, as such, the application cannot be supported.

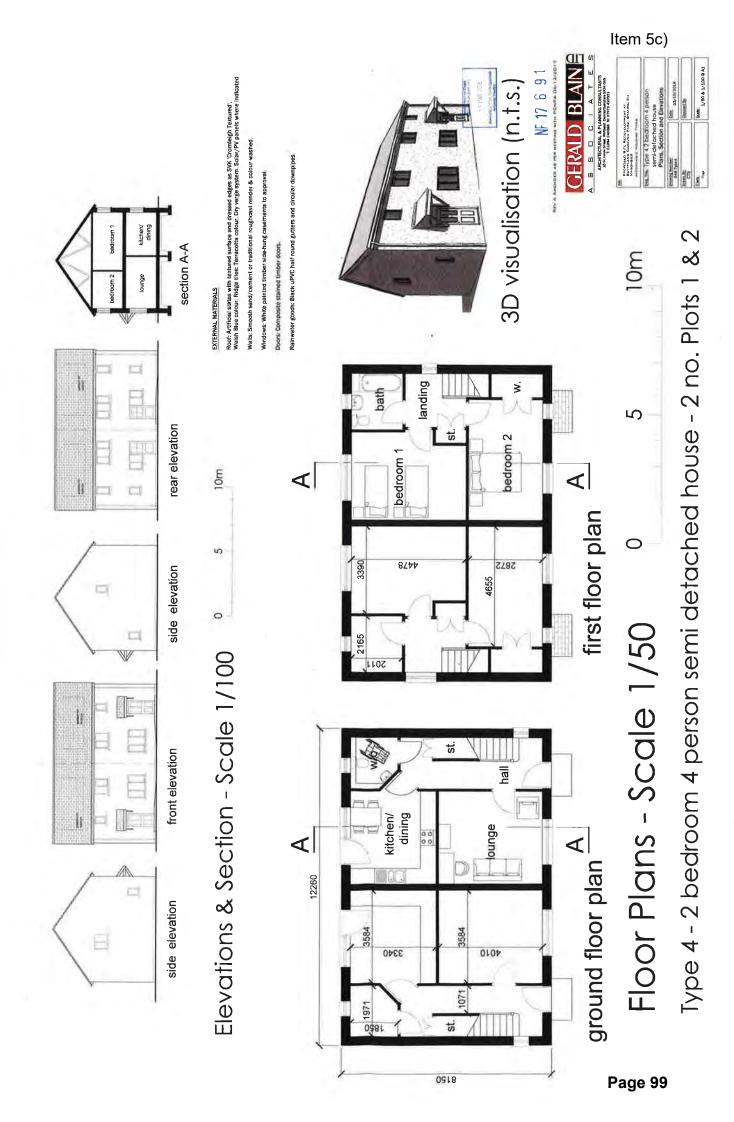
Recommendation

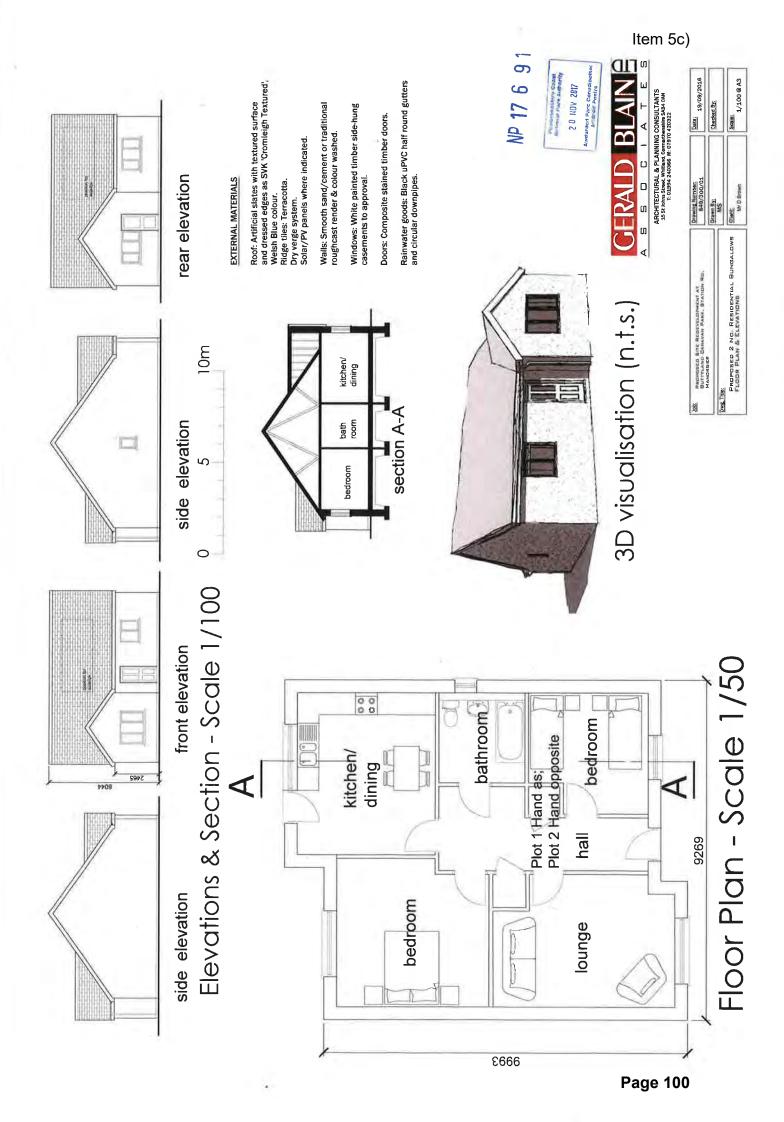
REFUSE, for the following reasons:

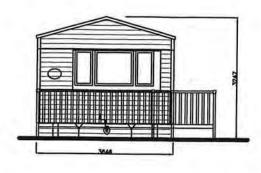
- The application fails to provide for affordable housing in perpetuity through the provision of a suitable section 106 agreement. The application therefore fails under Policy 45 (Affordable Housing) and Supplementary Planning Guidance for Affordable Housing (adopted 5th November 2014) and is therefore contrary to guidance contained within Planning Policy Wales (Edition 9, November 2016).
- 2. The proposed development by virtue of its layout, design and scale will result in a harmful visual impact on the surrounding landscape and on the special qualities of the National Park, which is contrary to polices 8, 15, 35. 38 & 39 of the Local Development Plan.
- 3. The proposal fails to demonstrate adequate drainage provision, which is contrary to Policy 29 of the Local Development Plan.



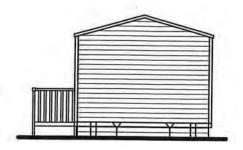








end elev.



end elev.

EXTERIOR
Onduline Pantile Roof
Domestic Gutters & Down Pipes
Painted Chassis
Pregalvanised Chassis
Fully Galvanised Heavy Duty Chassis
Aluminium Cladding
Extra Insulation
uPVC Double Glazing

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Promonentica Clast Hollonal Park Authority

20 NOV 2017

Awdurdod Parc Cenadisethői Artordir Pentre

JOB: PROPOSED SITE REDEVELOPMENT AT	DRAWING-NO: 849/200/01	DATE: 18/05/2017
BUTTYLAND CARAVAN PARK, STATION RD, MANORBIER	DRAWN BY: MS	CHECKED BY:
STATIC CARAVAN (TYPICAL LAYOUT)	MR. D. BROWN/PHA	1 Rage 10