

Item 5 - Report on Planning Applications

Application Ref: NP/21/0149/FUL

Case Officer Kate Attrill
Applicant Mr & Mrs Reynolds & Family
Agent Mr A Vaughan-Harries, Hayston Development & Planning
Proposal Change of use of land to create seasonal camping facility (7 no. tents & siting of welfare facility structure)
Site Location Speedlands Farm, Dale, Haverfordwest, Pembrokeshire, SA62 3QX
Grid Ref
Date Valid 08-Mar-2021 **Target Date** 09-Sep-2021

The application is referred to Committee for determination at the request of Cllr Reg Owens.

Consultee Response

Dale Community Council: No objection
Marloes & St Brides Community Council: Supporting
PCC - Drainage Engineers: Observations
PCNPA Tree and Landscape Officer: Reply
PCNPA Access Manager: No objection
Natural Resources Wales: Conditional Consent
Dwr Cymru Welsh Water: Conditional Consent
Pembrokeshire County Council: No objection

Public Response

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 requires that proposed developments are advertised by way of either neighbour letters or a site notice. In this case, both site notice and neighbour letters were sent.

Objections have been received from neighbouring properties detailing concerns over the impact of having fire pits, barbeques and log-burners potentially burning every night adjacent to residential gardens, in addition to amenity impacts of noise, traffic and disturbance. These issues are explored in more detail in the report below under 'Amenity'.

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>

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

Pembrokeshire Coast National Park Authority
Development Management Committee – 21st July 2021

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LDP2 Policy 10 - Sites and Species of European Importance
LDP2 Policy 11 - Nationally Protected Sites and Species
LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park
LDP2 Policy 29 - Sustainable Design
LDP2 Policy 30 - Amenity
LDP2 Policy 32 - Surface Water Drainage
LDP2 Policy 34 - Flooding and Coastal Inundation
LDP2 Policy 35 - Development in the Coastal Change Management Plan
LDP2 Policy 38 - Visitor Economy
LDP2 Policy 41 - Caravan, Camping & Chalet Development
LDP2 Policy 59 - Sustainable Transport
LDP2 Policy 60 - Impacts of Traffic
PPW11
SPG05 - Sustainable Design
SPG06 - Landscape
SPG22 - Seascape Character
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 14 - Coastal Planning
TAN 23 - Economic Development
TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m
Biodiversity Issue
Historic Landscape
ROW Coast Path - within 10m
Potential for surface water flooding
Recreation Character Areas
Affordable Housing Submarkets
Seascape Character Areas
Within Site of Special Scientific Interest consult NRW / Planning Ecologist_20m
Landscape Character Area
Special Area of Conservation - within 50m

Officer's Appraisal

Site and Context

Speedlands Farm is a mixed 25-acre agricultural holding overlooking Musselwick Bay. The site lies adjacent to a row of 6 semi-detached dwellings.

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The field, subject of this application lies 700 metres to the north of the development boundary for Dale.

Relevant Planning History

None.

Description of Proposal

The application has been amended since its original submission to alter the location of the tents and facility building in response to having been sited within the flood zone and has also since increased the number of tents to from 6 to 7.

The tents (which are classed as highly vulnerable development) have been re-located to be outside the flood zone, whilst the 'recreation area' remains within the coastal change zone and flood zone.

Each bell-tent measures 5 metres in diameter, and will sleep up to 8 adults on the typical details submitted with an optional flue for a wood-burner.

If the maximum occupancy were applied, a total of 56 people could be camping at any one time in the proposed area, although the planning statement suggests up to 5 occupants per tent with 12 parking spaces provided.

A facilities building for toilets and showers in the form of a timber clad portacabin is proposed for the provision of toilets and showers.

The agent has clarified what is meant by 'seasonal' since the submission of the application and states: 'the Portacabin will be on site from April to September while the site will be in use. Our client plans on running from the Easter school holidays through to September. While the site is closed the portacabin would be stored in one of the farms large sheds (where it would be out of sight) for the remaining time of the year.

A recreational area is detailed immediately to the south of the residential curtilage of Jubilee Villas, with the farmhouse in the applicants ownership being on the other side of the lane.

A new vehicular access is proposed on the south western side of the site with the existing field access at the eastern end changed to a pedestrian only access and car-parking being in the south-western corner of the site.

Key Issues

The application raises the following planning matters:

- Policy, Siting, and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Access and Parking
- Landscaping
- Biodiversity

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- Other Material Considerations: NRW consult response

Policy:

The site is located to the north of Dale and immediately adjacent a small group of houses close to the shore of the Haven Waterway.

A large proportion of the site is within a coastal risk management area defined in LDP2 and a C2 flood zone. In line with national planning policy, Policy 34 of LDP2 directs development away from areas at risk of flooding now or as predicted for the future by TAN15 development advice maps or Shoreline Management Plans.

TAN 15 (Development and Flood Risk) states that new development should be directed away from zone C. The TAN includes tests to be applied to developments proposed in zone C but details that highly vulnerable development should not be permitted in zone C2. Examples of highly vulnerable development provided in TAN2 includes caravan parks.

Natural Resources Wales have commented on the flood risk issue and stated: *'the planning application proposes highly vulnerable development for a new campsite and welfare facilities. Our Flood Risk Map confirms the site to be partially within Zone C2 of the Development Advice Map (DAM) contained in TAN15.*

We refer you to Section 6 of TAN15 and the Chief Planning Officer letter from Welsh Government, dated 9 January 2014, which affirms that highly vulnerable development should not be permitted in Zone C2 (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 do not apply to highly vulnerable development in Zone C2. Notwithstanding this policy position, we have reviewed the 'Tidal Flood risk Assessment' by Francis Sant submitted in support of the application to provide you with technical advice on the acceptability of flooding consequences in accordance with Appendix 1 of TAN15. Parts of the lower end of the site will be at risk of flooding in the tidal scenarios with an allowance of climate change and therefore the site does not comply with Table A1.14 of TAN 15. However, the site plan reference 02J, dated 20.05.2021 shows the camping facilities and the proposed toilet block outside the 0.1% Annual Probability of Flooding scenario with an allowance of climate change. As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users'.

Policy 35 of LDP2 requires proposals for development (other than dwellings) to be required to demonstrate that it will result in no increased risk to life or significant increase in risk to property. In this instance the site is currently undeveloped and so the introduction of any development will increase risk.

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There is a fundamental policy objection to development to this proposal for the reasons outlined above.

Policy 41 of LDP2 allows for new camping sites away from the coast and Preselis and in locations not intervisible with them. The application site is situated close to the estuary coastline at Pickleridge.

Supplementary Planning Guidance to LDP2 on Camping, Caravanning and Chalet development in the National Park, is based on a study undertaken in 2015 and formed part of the evidence base for the Plan itself. The SPG/study looks at the capacity of the National Park to absorb additional camping and caravanning development. It uses the 28 landscape character areas as a basis for the assessment. The application site is in landscape character area 9. The SPG details that there is limited capacity for new sites in the area but that the value of the area lies in its National Park status, the Registered Historic Landscape (Milford Haven Waterway), historic features and the SSSI (Milford Haven Waterway). The site is within the Registered Historic Landscape and close to the SSSI. In addition, it is close to the coastal edge and therefore in a highly sensitive location.

The summary of capacity in the area advises that there is no further capacity for development on the coastal edge.....or the valley between St Brides and Dale. The guidance therefore indicates that the site would have a detrimental impact on the landscape and special qualities of the National Park.

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP2) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

Policy 14 of the LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant visual intrusion and/or, that would be introducing or intensifying a use which is incompatible with its location. Criteria (c) and (d) resists development that would fail to harmonise with or enhance the landform and landscape character of the National Park and/or fails to incorporate important traditional features.

Policy 29 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).

Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. Policy 9 seeks to conserve that character and limit the impact of lighting which could negatively impact on the special qualities of the National Park.

The proposal would introduce a use incompatible with its location; fail to harmonise with or enhance the landscape; impact on the historic landscape and result in development of the undeveloped coast. It is therefore contrary to policies 41 (Camping, Caravanning and Chalet Development); 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and 8 (Special Qualities).

Amenity and Privacy:

Policy 30 is relevant to the development proposal being considered here.

It states that: ‘development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:

- a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
- b) the development is of a scale incompatible with its surroundings; and/or
- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
- d) the development is visually intrusive.

A number of objections have been received from residents of the adjacent Jubilee Villas. Concerns expressed have related to the impact of the potential for noise from occupants of the campsite, the potential for smoke pollution from a number of barbeques and log burners being in operation, and the disturbance caused by increased traffic.

The site immediately adjoins the line of housing which runs to the north of the agricultural field. There is a narrow strip of 7 metres width between the nearest residential garden and the edge of the campsite which forms part of the water companies land holding and features a hedgerow boundary.

One of the letters of representation suggests that a soundproofed fence ought to sited along the northern boundary to protect residential amenity. However, a soundproofed fence might have an appearance quite out of character with the countryside location and does not form part of the development proposals. Given that the site plan shows a ‘recreation area’ with tables and seating on the northern boundary, there would be an expectation that this is the area which would be utilised by campers in the evenings for socialising.

The potential for noise and disturbance to residential occupants is a significant material consideration.

The distance from the recreation area to the rear of neighbouring dwellings rear elevations is approximately 28 metres.

The site plan supplied does not accurately depict the siting of the closest adjacent dwelling. The application is not supported by a detailed assessment of the likely noise impact. Given the potential numbers of campers, which at maximum occupancy would be between 35 and 56 people, the level of noise and disturbance, as a matter of planning judgement is likely to be significantly detrimental to neighbouring properties’ residential amenity, and as such, the proposal is contrary to Policy 30 of the Local Development Plan.

Access and Parking:

The Highways Department of PCC has been consulted in respect to any potential impact on traffic or highway safety. Highways response is copied in full below:

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'The proposal is to establish a campsite comprising of six bell tents with a welfare building, to be used as seasonal accommodation as part of a farm diversification scheme.

The land sits approximately 1Km North of Dale; it is accessed by a no through minor road off the B4327. The plans show that existing gates to the field will be utilised the vehicular access is approximately 100m from the junction and pedestrian access approximately 25m from the junction. The gates are set back from the highway and the plans show that the area between the gates and the highway will be tarmacked. The visibility is good in both directions

The applications show that there will be hardstanding created of grasscrete for a small carpark for 12 space including two disabled spaces. With turning area available on site. The areas between the camping areas and welfare tents will be grassed areas.

Whilst there will be a seasonal increase in traffic movement, the amount is limited and will not have a negative impact on the highway network'.

There is no highways objection to the proposals and the scheme can therefore be considered to comply with Policies 59 & 60 of the LDP.

Landscaping & Biodiversity:

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

The Authority's Tree and Landscape Officer has been consulted with regards to the potential impact on existing landscaping, and a condition to require submission of further details has been suggested. These further details comprise:

- Scale plan on proposed site layout showing precise site-specific locations
- Schedules of plants (trees and hedges)
- Plant species
- Plant supply sizes
- Proposed numbers of each proposed species
- Hedge planting density and method (e.g. double staggered)
- Implementation programme / timescale / phasing of planting
- Management and replacement of failures details
- Pembrokeshire hedgebank construction

Subject to the imposition of landscaping conditions, the existing landscaping surrounding the site can be protected and enhanced.

Natural Resources Wales also commented on the landscaping and stated: 'We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition: Detailed landscape plan

Please note, without the inclusion of this condition and document we would object to this planning application.

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NRW go on to comment: *'we note the revised site layout, dated 25 May now shows 7 tents rather than 6. The plans indicate that the temporary toilet block would be clad in natural timber, allowed to weather, with a grey roof. The plan notes that the block would be removed in winter and stored in an agricultural shed. The proposals are acceptable, but we advise the toilet block roof should be finished in a dark grey to minimise visual impact from nearby high ground.'*

Please note, the Landscape Plan required by condition remains outstanding and we refer you to our letter to your Authority dated 20 April 2021 for the detail of this condition'.

NRW have also commented on the submitted ecological report and their comments are copied in full below:

European Protected Species We note the submission of the following report in support of the application: • 'Proposed Seasonal Bell Tent Facility with Toilet Block at Land at Speedwell Farm, Dale, Pembrokeshire. Preliminary Ecological Appraisal (V.1)' by Gould Ecology dated February 2021.

We welcome the recommendations in section 7.4 of the PEA report that the boundary hedgerows shall be protected during construction and retained in the long-term. We also welcome the recommendations in section 7.6 and 7.7 of the report regarding artificial lighting.

In view of this information, NRW considers that there should not be a detriment to the maintenance of the favourable conservation status of bat species present in the area, providing that the above PEA is included within the condition identifying approved plans and documents on the decision notice and the recommendations are implemented as agreed. European Protected Species: Legislation and Policy All species of British bats are European Protected Species, legally protected under The Conservation of Habitats and Species Regulations 2017 (as amended). Legal protection relates to the animals themselves and the places they use to rest and breed.

Where a European Protected Species is present and development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation. One of these requires that the development authorised will 'not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. These requirements are translated into planning policy through Planning Policy Wales (PPW) December 2018, section 6.4.22 and 6.4.23, and Technical Advice Note (TAN) 5, Nature Conservation and Planning (September 2009). The planning authority should take them into account when considering development proposals where a European Protected Species is present.

Protected Sites The site lies adjacent to the Gann Estuary, part of the Milford Haven Waterway Site of Special Scientific Interest (SSSI) and Pembrokeshire Marine Special Area of Conservation (SAC). Regulation 63 of the Conservation of Habitats

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and Species Regulations 2017 requires you, as the competent authority, to undertake an appropriate assessment of any plan or project which is likely to have significant effects, either alone or in combination with other plans and projects, on the SAC. Your Authority must satisfy itself that there are no likely significant effects, either alone or in combination with other plans and projects, and if necessary undertake an appropriate assessment of the implications of the proposed scheme for the SAC in view of its conservation objectives, before granting planning permission. In the Preliminary Ecological Appraisal (6.4 and 6.5), it is noted that it is possible for pollution (increased sedimentation and spills) to enter the stream to the North of the boundary during the construction phase. Mitigation should be put in place to avoid this and the applicant should follow GPP 5 guidance’.

Land Drainage:

The Drainage Engineers at Pembrokeshire County Council have been consulted with the development proposals; have confirmed that SAB consent would be required for the development, and have raised no objection, but have made the following comments:

‘We are aware of instances of historic flooding affecting the land to the immediate north of the site to which the application refers to which would include the highway and land located to the east as a result of fluvial and or tidal flooding. We have no records as to indicate whether the application site has been affected by these events. It would appear that the application site is substantially located within a C2 area at risk of fluvial and or tidal flooding as defined by Development Advice Maps referred to under TAN15 Development and Flood Risk. Advice should be sought from Natural Resources Wales with regard to flood risk if not already done so’.

Conclusion

There is a fundamental policy objection to development in this location which is partially within a C2 flood zone and within a coastal risk management area defined in LDP2. It is also contrary to Policy 41 which directs new camping sites to appropriate locations and to Policies 8 and 14 of LDP which protect the National Park and its special qualities.

The potential impact on residential amenity is not considered to comply with Policy 30 of the Local Development Plan and the application cannot therefore be supported.

Recommendation

REFUSE, for the following reason(s):

1. The proposed development introduces a recreational use within the coastal change management area as defined within the Local Development Plan proposals maps, and is therefore contrary to Policies 34 & 35 of the Pembrokeshire Coast National Park Local Development Plan, TAN15, and Planning Policy Wales.

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2. The proposed site will cause harm to the special qualities of the National Park's landscape, as identified within the Supplementary Planning Guidance for Camping, Caravanning and Chalet development and is therefore contrary to Policy 41 of the Pembrokeshire Coast National Park Local Development Plan.
3. The proposed development will lead to a detriment to the residential amenity of nearby dwellings, and is therefore contrary to Policy 30 of the Pembrokeshire Coast National Park Local Development Plan.



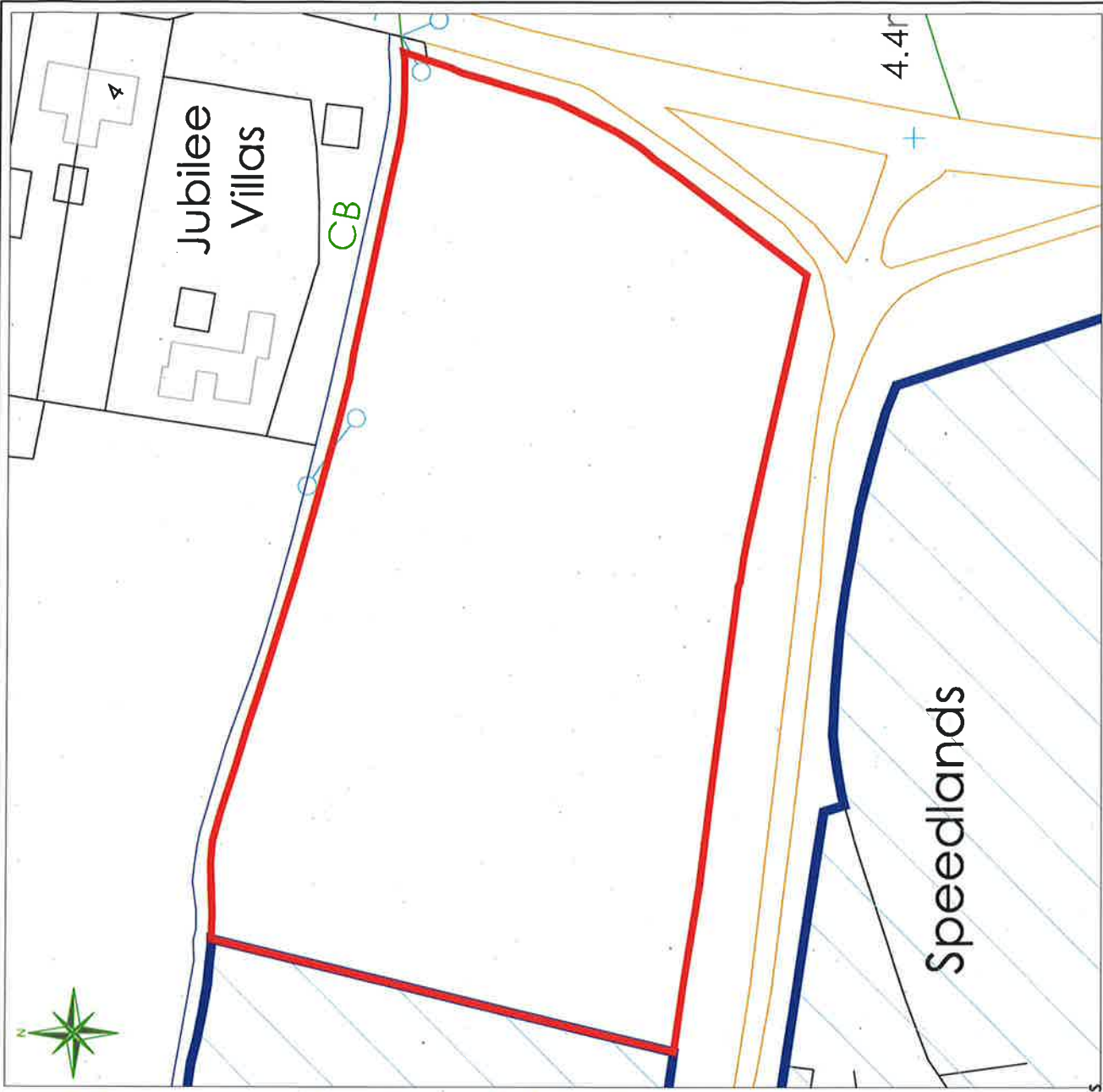
Location Plan - Scale 1:2500

Area of Proposed Plot (4731 m²)

Land in client ownership highlighted thus



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Block Plan - Scale 1:500

Farm Diversification with Creation of Seasonal Bell Tent Facility with Toilet Block under Policy 41 of LDP2
Speedlands Farm, Dale, Haverfordwest SA62 3QX

Designed by	Checked by	File name	Date	Scale	Client
		AVH_683	25.10.2020	A3 A's Shown	Mr Graham Reynolds
Drawing Title					
Location and Block Plans					
Dwg No. 01a					



SUPPLEMENTARY PLANTING PATTERN - DOUBLE STAGGERED ROW

PLANTS OF NATIVE SPECIES SHOULD BE SMALL BUSHY HEDGING TRANSPLANTS PLANTED 250mm APART, AND IN A DOUBLE STAGGERED ROW - 300MM APART (APPROX. 9 NO PLANTS PER METRE). PLANTS TO BE NOTCH PLANTED INTO EXISTING GROUND AND WATERED. BASE OF NEW HEDGE TO BE MULCHED AFTER PLANTING TO RETAIN MOISTURE AND REDUCE WEED COMPETITION. PROTECT FROM STOCK WITH FENCING. ALLOW TO GROW FOR MIN 3 YEARS BEFORE STAGED LAYING

PLANT MIX	:- NATIVE HEDGE ROW MIX B	BR [1+1]	40-60	7-10
15%	CORYLUS AVELANA	BR [1+1]	40-60	7-10
45%	CYRTAEGLUS MONOGYNA	BR [1+1]	40-60	7-10
10%	PRUNUS SPINOSA	BR [1+1]	40-60	7-10
10%	CORVUS SANGUINEA	BR [1+1]	40-60	5-5
5%	ILEX AQUIFOLIUM	CG [2L]	30-40	5-5
5%	LONICERA FEECHLI-MENUDA	CG [9CM]	30-40	5-5
5%	ROSA CANINA 'DR ARVENSIENS'	BR [1+1]	40-60	5-5
5%	VIORNIUM OPLULUS	BR [1+1]	40-60	5-5



4.2m

BM 5.15m

Touching
Go Bridge

4.4m

"To comply with the requirements for securing biodiversity enhancements (Para 6.4.5 of PPIW) the applicant will be installing Eco Bat boxes, bird boxes and hedgehog nest boxes around the perimeter of the application site."

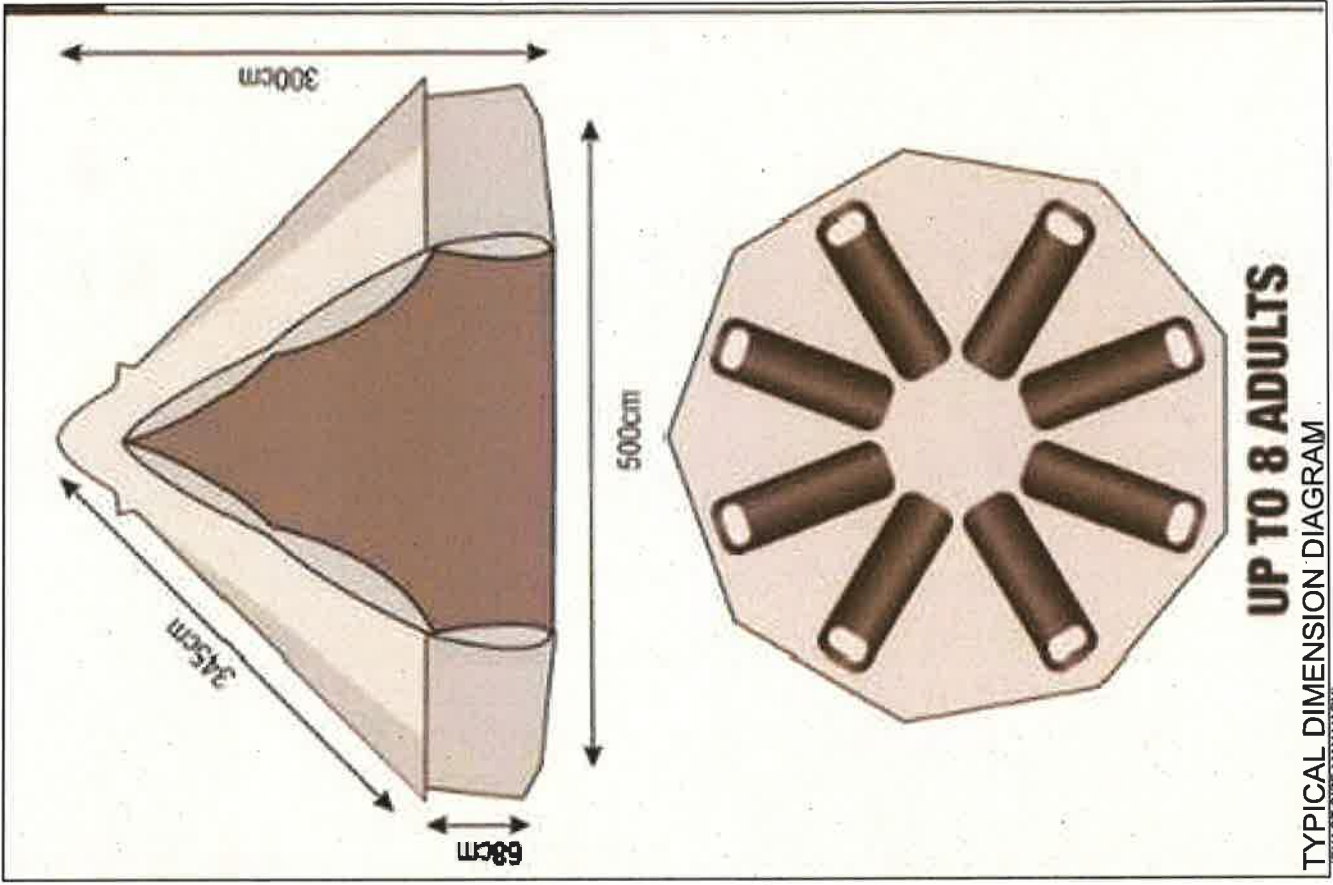
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Speedlands Farm Diversification with Creation of Seasonal Bell Tent Facility with Toilet Block under Policy 41 of LDP2
 Speedlands Farm, Dale, Haverfordwest SA62 3QX

Designed by: [] Checked by: [] File name: AVH_683 Date: 20.02.2021 Scale: A3 @ 1:500 Client: Mr Graham Reynolds

Drawing Title: Proposed Site Plan

Dwg No. **02a**



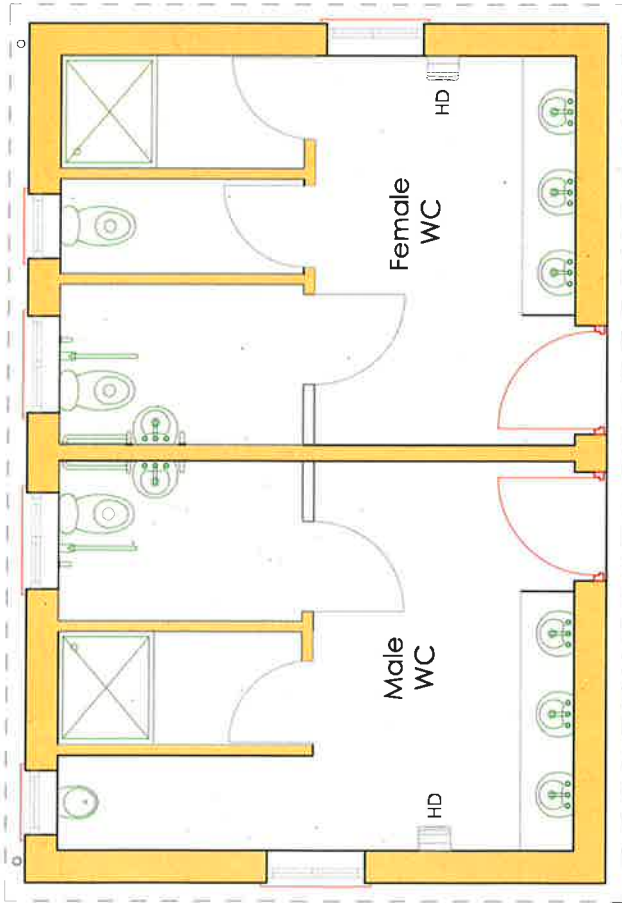
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Farm Diversification with Creation of Seasonal Bell Tent Facility with Toilet Block under Policy 41 of LDP2
Speedlands Farm, Dale, Haverfordwest SA62 3QX

Designed by Checked by
Drawing Title Bell Tent Typical Detail

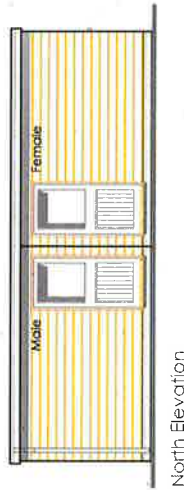
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Date 25.10.2020
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Client Mr Graham Reynolds



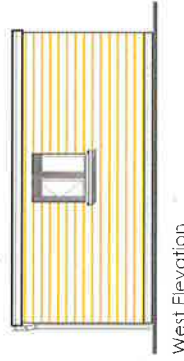
Floor Plan - Scale 1:50

FINISHES

- Walls - Timber cladding left to weather
- Doors - Timber painted white or white uPVC
- Windows - Timber painted white or white uPVC
- Roof - Glass fibre - grey in colour
- Rainwater goods - white uPVC



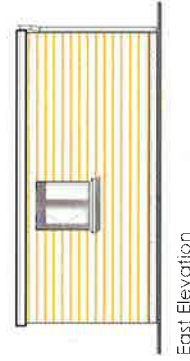
North Elevation



West Elevation



South Elevation



East Elevation

Elevations - Scale 1:100



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Farm Diversification with Creation of Seasonal Bell Tent Facility with Toilet Block under Policy 41 of LDP2
Speedlands Farm, Dale, Haverfordwest SA62 3QX

Designed by	Checked by	File name	Date	Scale	Client
		AVH_683	22.04.2021	A3 @ as shown	Mr Graham Reynolds
Drawing Title					
Tammornan Toilet Block Details					