

Application Ref: NP/20/0516/FUL

Case Officer	Matthew Griffiths		
Applicant	Mr B Edmunds		
Agent	Mr T Mamara, T M Design (Carne) Ltd		
Proposal	Proposed addition of two chalets & three accommodation pods		
Site Location	Site adjacent to existing Chalets, Lawrenny Quay, Kilgetty, Pembrokeshire, SA68 0PR		
Grid Ref			
Date Valid	20-Nov-2020	Target Date	31-May-2021

This application is reported to Committee as the recommendation of the officer differs from the recommendation by Martletwy Community Council.

Consultee Response

Martletwy Community Council: Objecting

- a) Concerns with regard to the issues of an increase in volume of traffic and the unsuitability of the access road remain a material consideration in determining a decision on this application.
- b) The highway between the village and the site at Lawrenny Quay has various serious issues. The road surface is below standard. There are not enough safe passing spaces for the already considerable traffic.
- c) Councillors are concerned regarding the increase in the volume of traffic to this site, reached through the village, and the additional volume of traffic on site. Additional concerns are for the condition of the access road between the village and the application location. These issues were raised on the previous application, and on other occasions. In addition, residents of the village are, at the time of writing, requesting further urgent speed surveys due to the volume of traffic and excessive speeds through the village and on the access road to the site. The Community Council is working with the local authority and Go Safe on this matter.
- d) Councillors believe, should Pembrokeshire Coast National Park consider the application favourably, and before any further development can take place, a Section 106 contribution should be made to build new passing places along the access road, making it safer, and improve the condition of the existing access road condition (surface and edges) Council made a motion to object to the application based on their concerns with regard to the issues of an increase in volume of traffic and the unsuitability of the access road remaining a material consideration . The motion to object was passed by 2 - 1 votes Decision: Martletwy Community Council object to the application based on the material planning consideration of the highway and traffic issues mentioned above

PCC Transportation and Environment – No objection

Dwr Cymru Welsh Water – No objection

PCNPA – Planning Ecologist – Observations

PCNPA - Tree and Landscape Officer – No objection

Natural Resources Wales – No objection

PCC Drainage Engineers – Comments

PCNPA – Conservation Officer – No adverse comments

PCNPA – Access Manager – No adverse comments

Pembrokeshire Coast National Park Authority
Development Management Committee – 8th September 2021

Public Response

The application has been appropriately advertised in accordance with the requirements of the Town and Country Planning (General Development Management Procedure) Order (Wales) 2012.

One letter of objection was received that expressed concerns regarding the extent of the site and that it encroached into the area around a neighbouring chalet.

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 12 - Local Areas of Nature Conservation/Sites of Geological Interest

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 38 - Visitor Economy

LDP2 Policy 41 - Caravan, Camping & Chalet Development

LDP2 Policy 59 - Sustainable Transport

LDP2 Policy 60 - Impacts of Traffic

Constraints

Historic Landscape

Regionally Important Geological Sites

Recreation Character Areas

Affordable Housing Submarkets

Seascape Character Areas

Landscape Character Area

Officer's Appraisal

Introduction

Planning approval is sought for the siting of two additional chalets and three accommodation pods on land forming part of an existing chalet and caravan park at Lawrenny Quay.

Key Issues

The application raises the following planning matters:-

- Policy and Principle of Development
- Visual Amenity and Special Qualities of the National Park
- Amenity and Privacy
- Highway Safety and Access
- Landscaping and Biodiversity
- Land Drainage and Flooding

Site Description and Description of Development

Lawrenny Quay is an established owners only chalet and caravan park, boatyard, pub and tearoom alongside the Cleddau Estuary. The site is set among mature, mainly native broadleaved trees.

The site of development forms an area of existing hard standing and a small grass area within the existing holiday park. The existing hardstanding areas are used to provide vehicle parking and pitches for touring caravans. The applicant indicates that both areas have existing water sewage and electrical services.

The proposed development is for two chalets to be sited on the hardstanding area, these are of the same design as the existing chalets at the site. To the north of these chalets three accommodation pods are proposed on the area of land currently used for touring caravans.

Planning History

The applicants in submitting the application noted their view that the planning history is particularly relevant to this proposal. The relevant history is noted as follows:

PR/1444/2 for the erection of fourteen chalets granted permission 20 February 1967 at Lawrenny Ferry and subject to seven planning conditions. Correspondence on our files appear to indicate that there was a "show" chalet erected on site in September 1967.

PR/1444/3 for an amended layout of twelve chalets granted 7 December 1967. This is in effect a revised planning permission for 12 chalets. This impacts chalets 11, 12, 13 and 14 of the original planning permission. This permission was granted subject to a single condition that stated that the permission was subject to all conditions imposed on PR/1444/2.

Item 5 - Report on Planning Applications

The December 1967 permission appears to be a stand alone planning permission and it does not appear that it would have prevented the continued implementation of the earlier planning permission. However, any future development would need to ensure that it was in accordance with the approved plans. The siting of the currently proposed chalets do not match the siting of the previously permitted chalet development. In light of the current proposed siting only limited weight can be given to the previous history due to the difference in siting of the chalets in this proposal.

Key Planning Issues

Based on the information submitted the following are considered to be the key planning issues:

- Policy and Principle of Development
- Visual Amenity and Special Qualities of the National Park
- Residential Amenity
- Highway Safety and Access
- Ecology and Tree Impact

Policy and Principle of Development

As described above, this is an existing chalet site with planning permission granted in 1967 for 14 chalets, 12 of which have been in situ for several decades.

Policy 38 of LDP2 sets out the strategy for visitor economy in the National Park and allows for limited caravan, camping and chalet development. Policy 41 sets out further detail on where additional pitches may be provided and is based on a study undertaken in 2015 to examine the capacity of the National Park landscape to accommodate additional caravan, camping and chalet development. The study contributed to the evidence base for LDP2 and is now published as draft SPG for public consultation.

Policy 41 allows for new sites and pitches away from the coast and Preselis and in locations not inter-visible with them. In this instance the additional pitches are proposed within the area of the original chalet site and no extension to the overall site area is proposed.

Within the caravan and camping draft SPG, the site is within Landscape Character Area 28. Scope for additional provision of caravan, chalets and camping pitches is limited. The sensitivity to additional development is due to the highly distinctive character of the ria with scenic framed views, sloping woodland and pastoral valley sites, sparse settlements and features in a national-valued historic landscape, valued habitats and overall tranquillity of the area.

In this instance the site is located within an area of dispersed buildings and structures, linked to the quay on land used for touring caravan pitches and car parking. The SPG recognises that there may be areas screened by trees and high hedges where there may be limited capacity for small scale seasonal development. The proposed location for the additional chalets and pods is interspersed with existing mature trees and shrubs and this significantly mitigates any visual impact.

Item 5 - Report on Planning Applications

The additional structures are a small addition / change to the existing provision on the site in a secluded area.

It is considered that the proposal is in principle acceptable, subject to detailed consideration of the landscaping.

Visual Amenity and Special Qualities of the National Park

Policy 8 of LDP2 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 priority a) sense of remoteness and tranquillity is not lost and wherever possible enhanced and c) pattern and diversity of the landscape is 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 insensitively and unsympathetically sited within the landscape. 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 fail to incorporate important traditional features.

Policy 29 of the LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). Policy 30 of the LDP2 seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

There is substantial landscaping to the site which is mature and filters views into the site. Additional landscaping to the site can also be secured by a planning condition. Any additional lighting can be conditioned to ensure that light spill is reduced and meets the requirements of Policy 9 of LDP2. The additions to the existing chalet site are within a well-screened area, which is used as car parking and as touring caravan pitches. Due to the use as touring pitches there is existing road access and utilities present. The nature of the site with existing landscaping and limited scale of the proposal mitigates the visual impact to an acceptable level. The chalets are of the same design as the existing chalets at the site and will be seen as a minor addition to the existing site, the materials and colours are recessive and would not be visually intrusive. A typical pod design has been submitted these are timber units which are not permanent buildings and are considered to form a change of use of land rather than physical development. The typical pod design is 5.4m by 3m with an arched roof. Full details of the pods can be secured by condition to ensure that they are of appropriate low impact design.

Therefore, it is considered that the scheme can be supported in terms of its impact on the visual amenity and special qualities of the National Park.

Residential amenity

Correspondence has been received which expressed concerns regarding the positioning of the proposed chalets.

Item 5 - Report on Planning Applications

Policy 30 of LDP2 refers to matters of amenity, and requires proposals to be 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 chalets are located on a site that is reasonably positioned away from the existing units and the existing trees will continue to provide screening. It appears that the matter more relates to the larger red line boundary and that it takes in land around the chalets to which there are leasehold interests. However no clear evidence has been provided that notice was not correctly served and the application has also been publicised and an opportunity for representations to be made.

Overall it is considered that the proposal would achieve an acceptable level of amenity, reflecting its use as holiday accommodation. The site is isolated from residential properties and it is not considered that it would give rise to amenity concerns and complies with policy 30 of the LDP2.

Highway Safety and Access

Correspondence has been received from the Martletwy Community Council which raised continuing concerns regarding the appropriateness of the access to the site and the potential for a detrimental impact on highway safety and the free flow of traffic.

The site is served by the C3806, which travels south from Lawrenny village. This road is narrow and in places has poor alignment. The road serves Lawrenny Quay only, but will be particularly busy during holiday periods. The concerns regarding the potential for additional use of this highway are shared by the Local Highways Authority, who initially objected to the application. However, following discussions with the applicant they withdrew their objection and provided the following advice:

'The addition of supplementary information highlights that the pods and chalets will be located on the site of 12 touring caravan pitches. The replacement of these pitches means that overall trip generation to the site will be reduced.'

As noted above the proposal will replace existing touring pitches at the site and in light of the advice of the local highways authority, it will not lead to further congestion or danger on the highway in light of this advice it is considered the proposal is in accordance with Policies 59 and 60 of the LDP.

Ecology and Tree Impact:

The applicant has submitted a tree survey and ecological survey with appropriate recommendations in support of the application. These have been reviewed by appropriate consultees.

Ecological surveys identified that only a small patch of scrub and trees and a limited amount of vegetation will need to be removed. The small patch of scrub is dominated by bramble, three immature sycamore and two mature holly trees. It is considered very unlikely that the removal of a small patch of bramble, small sycamore and holly

Item 5 - Report on Planning Applications

will have any impacts on biodiversity. As some scrub is to be removed, works to remove it will avoid the bird nesting season. As there are a high number of known bat records in the area, lighting will be downward facing and positioned away from habitat and this will be secured by condition.

The development site lies adjacent to the Pembrokeshire Marine Special Area of Conservation (SAC) and the Milford Haven Waterway Site of Special Scientific Interest (SSSI) surrounds the entire caravan site. Regulation 63 of the Conservation of Habitats and Species Regulations 2017 requires us, 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. This has been undertaken by the NP Planning Ecologist and will be referred to NRW prior to the Committee. Subject to condition the Authority is satisfied that there are no implications from the proposed scheme for the SAC in view of its conservation objectives.

Other material considerations

The site is outside of the flood risk areas identified in TAN15.

Pembrokeshire County Council Drainage Engineers have indicated that the proposal will not require formal SAB approval, the development is sited on existing areas of hard standing.

A condition will need to be imposed to ensure that the accommodation is used for holiday accommodation only.

Welsh Water has raised no objection to the proposed development in terms of water supply.

Conclusion

Notwithstanding the objections received, following consideration of the policies contained within the Local Development Plan 2 and National Planning Policy in the form of Planning Policy Wales (Edition 11, February 2021) and having regard to all material considerations it is considered that the proposal is an acceptable and sustainable form of development.

The development will be in keeping with the aims of the LDP2 in that the development and will conserve and enhance the existing character of the site and the special qualities of this area of the National Park. As such, and subject to a schedule of suitable conditions to control the development, the development is considered to be acceptable and complies with the requirements of Local Development Plan 2.

Recommendation

A further verbal report will be given on the outcome of consultation with NRW regarding the Habitat Regulations Assessment undertaken on the development.

Item 5 - Report on Planning Applications

Subject to this being acceptable the proposal is recommended for approval subject to the following conditions.

Conditions/Reasons

1. The development shall begin not later than five years from the date of this decision.
Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).
2. The development shall be carried out in accordance with the following approved plans and documents:
 - Location Plan
 - Proposed Chalet Site
 - Proposed Chalets Plan
 - Landscape/Tree Plan
 - Arboricultural impact assessment and method statement for a proposed development at Lawrenny Quay, Lawrenny, Pembrokeshire, SA68 0PR by Tree Consultants Wales (reference PC21-71) dated 13 May 2021.
 - Ecology Survey Lawrenny Quay Caravan Site, Lawrenny Quay, Pembrokeshire by Kite Ecology Dated May 2021Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
3. Prior to their installation full plans of the holiday accommodation “pods” shall be submitted to and approved in writing by the Local Planning Authority. The pods shall only be sited at the locations shown on the landscape/tree plan and retained in accordance with the approved details, unless an alternative design is agreed in writing with the local planning authority prior to any change.
Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
4. Two chalets only, of the design shown on the approved plans, shall be sited on the application site at any one time in the locations shown on the landscape / tree plan.
Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
5. The accommodation pods and chalets hereby granted full planning permission, shall be occupied as holiday accommodation only and shall

Item 5 - Report on Planning Applications

not be occupied as a person's sole or main place of residence. An up-to-date register shall be kept and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all of the occupiers of the accommodation, their main home addresses and their date of arrival and departure from the accommodation.

Reason: In order to ensure that the accommodation is occupied solely for holiday letting purposes only and not for any other residential purpose.

Policy: Local Development Plan – Policy 41 (Caravan, Camping and Chalet Development), para 4.220 (supporting text).

6. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, no development within Parts 4 and 5 of Schedule 2 (relating to temporary buildings, uses and caravan sites) to that Order (or any Order revoking or re-enacting that Order) shall be carried out without specific planning permission being obtained.

Reason: To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

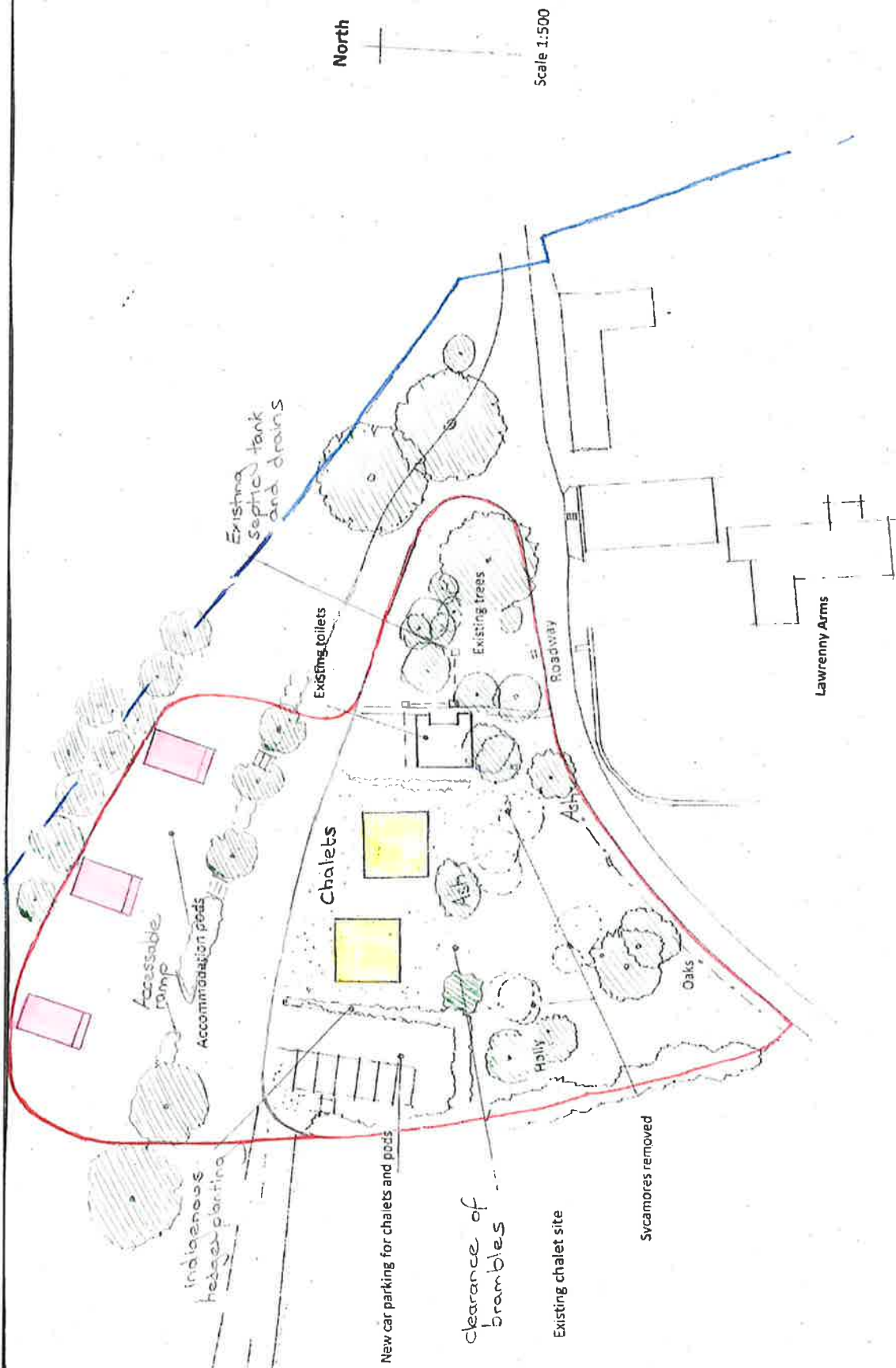
7. Prior to the first use of permanent lighting at the site, full details shall be submitted to and approved in writing by the Local Planning Authority. Lighting shall be installed and operated in accordance with the approved details (the lighting shall follow the requirements outlined in the ecologists report). No additional lighting shall be installed unless a revised Lighting Strategy is submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2017 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (Sites and Species of European Importance) 12 (Local Areas of Nature Conservation or Sites of Geological Interest) (Light Pollution) and 14 (Conservation of the Pembrokeshire Coast National Park).

8. Details shall be provided of the off-street parking facilities, if required as alternative facility is not available, this shall include details of disabled parking spaces. The approved parking shall be provided before the building / accommodation pods are first occupied, and thereafter retained for that purpose.

Reason: To ensure the satisfactory provision of parking facilities and in the interest of highway safety and the amenity of the area, and to accord with Policy 59 of the Local Development Plan 2 for the Pembrokeshire Coast National Park (adopted 2020).

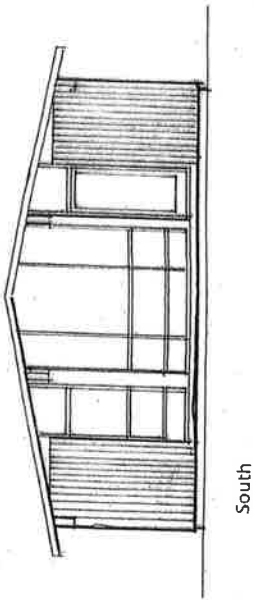
Item 5 - Report on Planning Applications



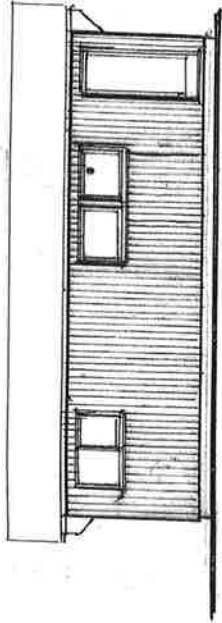
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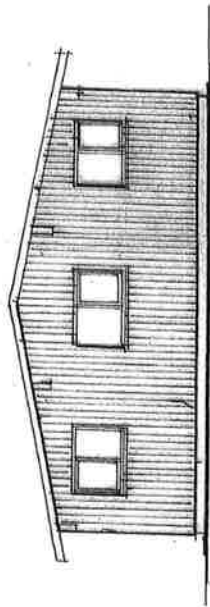
-  Accommodation pod
-  Chalet
-  Existing trees
-  Removed trees



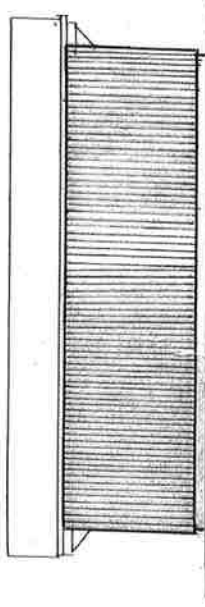
South



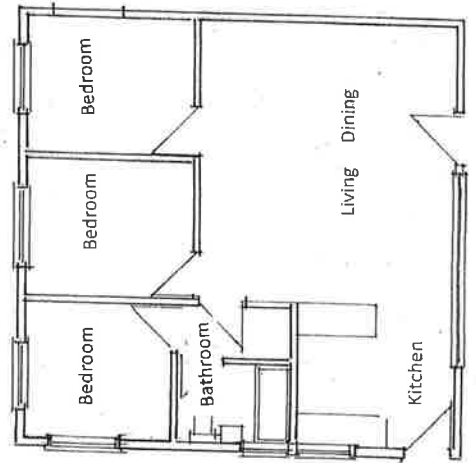
West



North



East

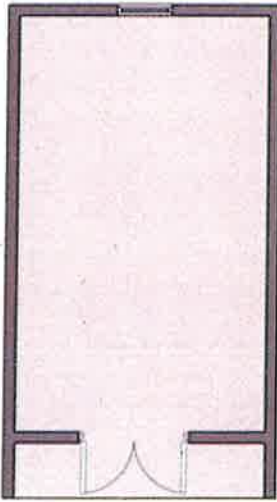


Proposed Chalet (repeat design of existing)





3000



5400