

Application Ref: NP/23/0246/FUL

Case Officer Kate Attrill
Applicant Agent Mr and Mr B & P Rees
Mr A Vaughan-Harries, Hayston Development & Planning Ltd
Proposal Change of use of pitch & putt area & expansion with 10 self-contained bespoke mobile lodges/caravans & car parking together with ecological enhancements
Site Location Tretio Caravan & Camping Park, St. Davids, Haverfordwest, Pembrokeshire, SA62 6DE
Grid Ref SM78642903
Date Valid 11-May-2023 **Target Date** 05-Jul-2023

This application is being considered by the Development Management Committee as it relates to a proposal for major development. A site visit was attended by Members of the Development Management Committee on the 8th January 2024.

Summary

The application is for the extension of an existing caravan and campsite, to add 10 mobile lodges/caravan and car parking provision on land previously used for pitch and putt.

The site is located on Best and Most Versatile land and is likely to have a negative impact on the special qualities of the National Park and therefore the recommendation is for refusal.

Consultee Response

NRW: No objection
PCC Access Officer: Advisory comments
PCC Drainage Engineers: Advisory comments
PCC Highways: Conditional consent
PCNPA Tree and Landscape Officer: Further information required
St Davids City Council: Support
Cadw: No objection
Heneb (formerly Dyfed Archaeological Trust): No comment
PCNPA Ecologist: Conditional consent
WG Agricultural Division: Advisory comments

Public Response

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

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Public response: A number of neighbour objections have been received to the proposal, including one joint response on behalf of a number of residents. Issues raised include:

- Previous enforcement issues on the site.
- Patterns of operation which are more intensive than the existing permissions allow.
- Existing antisocial behaviour and littering of those using the site impacting on neighbouring residents.
- Proposal would negatively impact on remote and sensitive location, which includes landscape, biodiversity, conservation and other protected land use designations including common land, SSSI, Village Green.
- Intervisibility with important landscape points including Carns rock outcrops.
- Potential impact on Special Area of Conservation.
- Potential impact on SSSI.
- Negative impact on Landscape Character Area which is outstanding in quality.
- Visual impact of proposal.
- Insufficient environmental improvements proposed to justify extension to the existing site.
- Proposal should be for no net increase in capacity/unit numbers to deliver an environmental improvement on site.
- Proposal conflicts with planning policy
- Nature of proposed use is incompatible and unacceptable in its location
- Pitch and putt site is not a brownfield site and a planning condition on the historic permission requires its reversion to agricultural use should use of the area cease
- Traffic and sustainability issues – lack of public transport to the site
- Expansion of site will further worsen water pressure issues in the area

Where material, these are discussed within the body of the report.

Policies considered

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

[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

Future Wales - The National Plan 2040 (FW which was adopted on 24th February 2022

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

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 20 - Scale of Growth

LDP2 Policy 29 - Sustainable Design

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LDP2 Policy 30 - Amenity
LDP2 Policy 32 - Surface Water Drainage
LDP2 Policy 38 - Visitor Economy
LDP2 Policy 41 - Caravan, Camping & Chalet Development
LDP2 Policy 42 - Site Facilities on Tent, Chalet & Caravan Sites
LDP2 Policy 43 - Employment Sites and Live/Work Units
PPW11
SPG02 - Landscape
SPG06 - Caravan Camping & Chalet
TAN 13 - Tourism
TAN24 The Historic Environment

Constraints

Special Area of Conservation - within 500m
Safeguarding Zone
Ancient Monument - within 500m
Hazardous Zones
Recreation Character Areas
Affordable Housing Submarkets
Landscape Character Area

Main Issues

- Acceptability of the principle of development
- Acceptability in terms of landscape and visual impact and other Special Qualities of the National Park including historic environment
- Whether an appropriate design is achieved in accordance with policies
- Whether transportation matters are appropriately addressed
- Whether there is an adverse effect on amenity
- Whether nature conservation interests are satisfactorily protected and if biodiversity enhancements are achieved
- Whether water and drainage impacts are adequately addressed

Officer's Appraisal

Site and Proposed development

Tretio Caravan and Camping site is located within north Pembrokeshire, approximately 6kms from St Davids and a short distance to the north-east of the hamlet of Tretio. The site is located in open countryside and is surrounded by fields and pockets of woodland. A public footpath runs to the south-eastern boundary of the land.

The existing site includes a caravan/mobile home used as a managers site, reception building, toilet block, play area and small caravan storage area. The main

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holiday complex contains 30 static holiday caravans and pitches for 10 motorhomes as well as 46 tent pitches, some with electrical hook ups.

The proposal is to extend the existing caravan and camping site onto an area of land which has previous permission as a pitch and putt golf course and a section of informal grassed play area on the far south-eastern part of the site.

Planning History

- PA/22/0133 - Pre-application enquiry - Support
- NP/17/0685/CLE - Certificate of Lawfulness for existing use - siting of 1 additional mobile home, use of southern field for seasonal siting of tents, touring caravans and motor homes and existing ancillary operational development - Approved 11 Jan 2018
- 04/662 - Dwelling for Management - Refused 16 Dec 2004
- D2/93/32 - Permission for pitch and putt golf course - Approved

Principle of Development

Camping and Caravan policy

Future Wales - the National Plan 2040 (FW) is the national development framework for Wales - it is the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) and Policy 5 (Supporting the Rural Economy) are intended to inform policies in Strategic and Local Development Plans.

Planning Policy Wales Edition 11 paragraph 5.5.3 notes that "In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate. Development should be sympathetic in nature and scale to the local environment."

The application site is outside any Centre boundary and is therefore in a countryside location. Policy 7 Countryside notes that development outside identified Centres must be strictly controlled. Development which is acceptable in principle includes tourist attractions or recreational activity where the need to locate in the countryside is essential, Policy 7 cross references Policy 43 and Policy 28 Visitor Economy.

The campsite is an established business - Policy 43 supports extensions to established businesses in order to provide and safeguard employment opportunities. The proposal is to add 10 additional chalets or caravans to an area of the site previously used for pitch and putt. Policy 38 Visitor Economy seeks to ensure that the National Park environment is conserved and enhanced by allowing limited caravan, camping and chalet development.

Policy 41 Caravan, Camping and Chalet Development provides detailed criteria that will be used to assess proposals. Three types of proposals are considered acceptable:

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"New caravan, camping and chalet sites and changes of pitch types within existing sites will be considered away from the coast and Preselis and in locations not intervisible with them.

Extensions to existing sites will be considered where the extension is in a well-screened location.

Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvements in relation to landscaping and layout will be permitted where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discrete locations."

Tretio Caravan and Camping site is an existing site, and whilst objectors have highlighted that its permission was granted through a Certificate of Lawfulness, this historic background is not material.

The proposal is to add 10 chalets onto an area which has not historically been used by tents or caravans. This is an increase to the number of pitches to the overall site rather than a re-allocation of pitches.

The acceptability of the proposal thus depends on whether or not the extension is considered to be in a well-screened location. If the location is not deemed well screened, then the proposal would be required to meet the criteria of the third element of the policy which involves no overall increase in pitch numbers and environmental improvements to the site as a whole.

Paragraph 4.213 of the reasoned justification supporting Policy 41 states:

"Opportunities for new sites and extensions to existing sites are generally small-scale, catering for seasonal touring caravan or camping pitches. There may be a very small number of opportunities for medium scale proposals. Opportunities for new large-scale static sites were not found."

Table 7 of the LDP2 classifies static medium sites as being proposals for static units including caravans, chalets and pods/hard structure glamping options on a site area which is greater than 0.5ha and a maximum of 3ha in size. This proposal falls within that category.

The Authority's Landscape Character Area Supplementary Planning Guidance document identifies this site as falling within the Dowrog and Tretio Commons Landscape Area (LCA 15). This area is described as follows:

LCA15 – Dowrog & Tretio Commons 6.1.18 This is a large tract of inland plateau lying northeast of the city of St. David's. It is substantially open and includes the large areas of open access land on the Dowrog and Tretio Commons, which are owned by the National Trust. These relatively flat low-lying open moorland areas are rare within the National Park and form part of the St. David's headland, with its huge historical and cultural significance within Wales and the Christian church, and has

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strong links to the city. There is a very long history of settlement and a distinctive local vernacular architecture.

The Authority's Caravan, Camping and Chalet Supplementary Planning Guidance (SPG) document (adopted in May 2021) identifies the sensitivity of different landscape character areas for caravan, camping and chalet proposals and provides information on whether or not there is landscape capacity for additional development of pitches.

LCA 15 is identified as having a High/medium sensitivity to medium static proposals. It is considered to have limited capacity for further developments/units. The SPG notes that "There may be limited capacity for extension of existing sites provided they are contained within mature hedges/trees or for small seasonal sites." In relation to capacity for extensions to existing sites it states "There may be limited capacity for extension of existing sites provided they are contained within mature hedges/trees. The extensions would best be for seasonal use but a small number of static caravans may be acceptable provided there is strong screening."

In considering the proposal, Officers are of the view that the site as a whole contains some elements which are not sufficiently well-screened, the roofs of the existing caravans are clearly visible along the roadside and from the north and west of the site which would be exacerbated by this proposal. The extension proposed is also within an area which is visible within the wider landscape.

In such circumstances Policy 41 is supportive only where the proposal does not result in a net gain of pitches and results in a clear environmental improvement. The landscape sensitivity of the area in which the proposal is medium/high for this type of proposal and Officers consider that the proposal in conjunction with the prominence of the wider existing site would result in a detrimental visual impact to the National Park.

Policy 1 National Park Purposes and Duty notes that development in the National Park must be compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and the public understanding and enjoyment of the special qualities by the public. The Sandford Principle asserts the primacy of the first purpose over the second in cases of irreconcilable conflict and given the particular sensitivities of the landscape in this case to static caravan sites, Officers consider that development here would not be compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and that that takes primacy over any tourism benefits of the proposal.

Officers of the Authority consider that the proposal is not acceptable and does not comply with Policies 1, 7, 38 and 41 of LDP 2.

Best and Most Versatile Agricultural Land

The applicant has stated that the sites permission for pitch and putt golf course means that the area of land in question is previously developed land. Objectors have disputed this and pointed to the condition requiring its restoration for agricultural purposes should this use cease.

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Officers do not consider the land in question to be previously developed land.

The definition of previously developed land in Planning Policy Wales is: 'that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures. Excluded from the definition are:

- land and buildings currently in use for agricultural or forestry purposes;
- land which has not been developed previously, for example parks, recreation grounds, golf courses and allotments, even though these areas may contain certain urban features such as paths, pavilions and other buildings;
- land where the remains of any structure or activity have blended into the landscape over time so that they can reasonably be considered part of the natural surroundings;
- land which is species rich and biodiverse and may qualify as section 7 habitat' or be identified as having nature conservation value; and
- previously developed land subsequently put to an amenity use.

Based on the Predictive Agricultural Land Classification Map for Wales the site is considered ALC Subgrade 3A (Best and Most Versatile Agricultural Land).

The WG Agricultural Land Use team have been consulted and have confirmed that the Predictive ALC map grade (3a) can be taken as best available information on agricultural land quality. They note as the proposal is for hard development, it is for the determining authority to consider if the application meets the requirements of PPW paragraph 3.59 in determining the overriding need.

Planning Policy Wales Edition 11 section 3.58 states that agricultural land of grades 1, 2 and 3a is the best and most versatile, and should be conserved as a finite resource for the future.

Section 3.59 goes on to clarify: "When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."

Officers have assessed the site in relation to national planning policy. They have concluded that the presence of a planning condition on the pitch and putt golf course which requires the site to be returned to agricultural use if the activities cease for 12

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months, means that the site should still be assessed as essentially greenfield and that paragraph 3.59 of PPW Edition 11 should therefore be considered. A note on the file from when the pitch and putt was approved refers to the need for a condition 'in case this is used to justify an extension to the caravan site in the future', so it can be seen that the condition was specifically intended to prevent future expansion of the caravan site onto this field.

A static caravan proposal is not considered to meet the overriding need for development required by PPW Edition 11. Therefore, the proposal is considered to not comply with the requirements of national planning policy in relation to Best and Most Versatile Land.

Landscape, Visual Impact and Impact on Special Qualities of the National Park

TAN 13 paragraph 13 states that "new and extended sites should be effectively screened and planned so as not to be visually intrusive."

Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) of the PCNPA LDP2 requires that development harmonises with the landscape and incorporates traditional features. The policy also seeks to prevent development which would cause visual intrusion and or would introduce or intensify a use which is incompatible with its location.

Policy 8 criterion c requires that the pattern and diversity of the landscape is protected and where possible enhanced.

Proposed landscape measures are included within the application. The landscape in this part of the National Park is very open in nature, with traditional hedgebanks dominating. Significant tree planting would therefore potentially introduce an alien element to this landscape. Strengthening hedgerows with the addition of traditional species such as gorse could add to screening of the site, but this would not screen the bulk of the development from the wider landscape, only from immediate views. Similarly, the prior approval of external lighting details a could also be required by planning condition.

Whilst landscaping measures could ensure that the proposal incorporated traditional features within the site and limited the visual intrusion of the proposal, significant screening would require the introduction of tree planting which would change the traditional pattern and diversity of this part of the National Park landscape. The extension of the site as a whole into an area which is currently open in nature would also intensify the use of the caravan and campsite. This would result in a detrimental impact to the landscape in this part of the National Park and cause visual intrusion. The proposal as a whole therefore is not considered to meet the criteria of Policy 14 or Policy 8 (criterion c).

Historic Environment

Policy 8 (Special Qualities) requires that the historic environment is protected and where possible enhanced. In the context of this application, the policy applies to

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Scheduled Ancient Monuments and any associated archaeology. No Listed Buildings exist in Tretio, however objectors have drawn attention to the high quality of properties within the Hamlet in terms of general historic interest.

The proposal would be visible, through the trees from the inland footpath which runs to the south and this would increase the proximity of the caravan and camp site to the hamlet of Tretio including buildings of historic interest such as the former Chapel.

Tretio contains a number of good vernacular buildings, some of which are of listable quality. These include Ty To (carefully restored complete with thatched roof) and well-preserved/restored cottages such as The Old Shop and Greenbank Cottage. The village is one of a number of 'satellite' settlements around St Davids which grew around a chapel, in this case Bethel Baptist (long closed, but still intact as a prominent building of local importance). The setting of the village is typical of the St Davids peninsula, characterised by fields with wide open views, the settlement itself sheltered by trees, hedgebanks and garden boundaries, characterised by a scattering of farms (west, middle and east), cottages and the chapel.

The development site lies to the north of the village, separated by a small field, itself screened by a thick belt of semi-mature trees which were planted through a grant from Dyfed County Council in 1993. From within the village, the impact of the proposed development is likely to have a negligible impact due to the tree screening, distance and to some extent, elevation. However, on the northern approach, the site creates an obvious and invaluable buffer between the caravan site and village. To develop this would be harmful, detracting from the setting of what is an isolated settlement. Compounded by the proposed tree-screening of the roadside boundary, itself at odds with the low windswept hedge banks characterising the immediate environs.

There is a Registered Historic Landscape (St Davids Peninsula and Ramsey Head) just over a hundred metres to the south of the development site, and the inland footpath which connects Tretio to the coast path runs along the edge of this, from where the existing caravans can just be seen, but from where the new proposed caravans would have a much greater visual impact.

As set out above, the site itself falls within the Landscape Character Area 15 (LCA15) Dowrog & Tretio Commons. The area is described as being of:

- a largely open character comprised of a mosaic of farmland, marshy grassland and scrub
- The wealth of historical and archaeological features recorded here is of national significance and result in a landscape of outstanding value. The scattered farmsteads and hamlets have a very strong architectural 'signature' which contributes very strongly to the sense of place here. There are strong archaeological similarities to the adjacent St David's Headland LCA - a historical landscape of outstanding value

The management guidance for the LCA states:

Preserve the agricultural and mosaic character, with the regular cyclical appropriate management of field boundary hedgebanks

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*Consider appropriate future re-use of historic farm buildings at end of agricultural life and ensure that any agricultural buildings **respect the historical and cultural significance of the landscape in terms of their siting, layout, form and construction materials.***

The siting of an increased number of static caravans within this landscape would be contrary to the management aims of the SPG in this instance.

The proposal cannot be considered to adequately comply with Policy 8 Special Qualities criterion a, b, c and d in relation to the historic environment.

Design

The design is a low-density design with a central wildflower meadow. The design reflects guidance within the Authority's Camping and Caravan Capacity SPG which suggests siting caravans around the edge of a field.

The static caravans proposed are permanent in nature and would be on site all year round. A circular access of permeable compacted crushed stone is proposed to access the units, which would also result in a physical and permanent change to the field in question.

No landscaping to the wider caravan site has been proposed by this application.

The design as a whole is considered acceptable and fairly typical of a static caravan site, however the physical elements of the proposal - the permanent nature of the units and the compacted crushed stone track would both introduce elements of visual intrusion into what is currently a landscape with an open nature.

Transportation Matters

National planning policy accepts that for most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys. It is recognised that the planning system has a key role to play in reducing the need to travel, particularly by private car, and supporting sustainable transport, by facilitating developments which are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car; make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

Policy 29 (Sustainable Design) requires proposals to be well designed in terms of Accessibility. Policy 59 (Sustainable Transport) is consistent with these objectives, seeking to permit development which promotes sustainable travel choices and reduces the need to travel by car by ensuring new development is well designed and provides appropriate access for pedestrians, cyclists, vehicles and public transport

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where appropriate and not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated. Policy 60 (Impacts of Traffic) prevents development where appropriate access cannot be achieved; where traffic would generate an unacceptable adverse effect in terms of congestion, times of generation or where there is an unacceptable adverse effect on road safety.

Tretio Caravan and Camping Park lies to the north of Pembrokeshire, approximately 6kms (4 miles) from St. David's. The site is accessible from an unnamed road which runs from St. Davids to Penparc or from the A487.

No bus services operate on the route to the Caravan and Camping Park - the closest bus route travels along the A487 with the caravan and camping park a further 40-minute walk from this stop. It is therefore considered likely that those visiting the Park and the proposed units will travel exclusively by car to arrive. Once staying at the Park there are cycling opportunities available nearby with a cycle route operating on local roads adjacent to the site and pedestrian links proposed within the Park.

The County Highways Authority has recommended that the applicant install dedicated cycle parking to encourage clients to use sustainable modes of transport when staying at the site. The Highways Authority has also advised that the refurbishment of the existing highway to repair existing potholes and improve road quality be required prior to any caravans being occupied or the use commencing. It would be possible to address these issues through a planning condition.

Whilst the local transportation impacts can be mitigated via condition, the location of the site as a whole which does not benefit from any bus route connections, is considered unsustainable.

The introduction of 10 additional lodges in this countryside location, in an area with no bus service is therefore considered contrary to Policy 29 Sustainable Design with regards to Accessibility and Policy 59 Sustainable Transport criterion (c) as appropriate access via public transport is not provided. It is recognised that local impacts with regards to the refurbishment of the existing highway and the provision of cycle parking could be controlled by planning condition, however this does not outweigh the unsustainable location in this instance.

Amenity

Policy 30 of LDP2 refers to 'amenity' in general with criteria (a) and (b) seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties.

There are no neighbouring residential properties that would be immediately affected by the development due to the physical separation from the proposed site. Objections have been received in relation to antisocial behaviour and littering from the existing site - however such behaviour is not a matter that the planning system can control in this instance. Waste management would be an aspect that could be controlled through appropriate condition when it came to the site as a whole. As such the proposed development is considered to comply with Policy 30 of the LDP2.

Nature Conservation

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 site lies 270m from the Northwest Pembrokeshire Commons SAC and Tretio Common Site of Special Scientific Interest.

The first stage in a Habitats Regulations Assessment is screening the plan or project to determine the need for a Habitats Regulations Assessment (HRA), and if so, then undertaking a Test for Likely Significant Effect (TLSE). This assessment consolidates information submitted as part of applications NP/23/0246 in order to determine whether there will be a likely significant effect on the Northwest Pembrokeshire Commons SAC or on the other National Site Network designations in the wider vicinity of the development.

As the competent authority, PCNPA have undertaken a TLSE under Regulation 63 of the Habitats Regulations to assess the proposal and its impacts on the integrity of the features of SACs. The PCNPA Ecologist has confirmed that there is no expected impact from the proposal.

Subject to the mitigation and enhancement to be secured by planning conditions, the Proposal would accord with policies 8, 10 and 11 and with legislation in relation to biodiversity and nature conservation.

Water and drainage impacts

The PCC Drainage Engineers consultation documents state that surface water from the development will be disposed of to a soakaway and that SUDS approval will be required.

Well-being

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

Conclusion

The proposed caravan site as submitted fails to accord with Local and National Planning policy in the following respects:

1. The extension to the caravan site is not considered to be well-screened within the landscape. As such a proposal to increase pitch numbers in this location without environmental improvements to the site as a whole does not meet the criteria of Policy 41 (Caravan, Camping and Chalet Development) of PCNPA LDP2.

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2. The proposed additional static pitches/lodges and track would result in a visual intrusion into the landscape of the National Park which is identified in this location as having a medium/high sensitivity with limited capacity for static site proposals. This would be contrary to the provisions of Policy 8 (Special Qualities), Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and the Authority's Supplementary Planning Guidance Document on Caravan, Camping and Chalets adopted May 2021.

3. The application wishes to change the use of Best and Most Versatile Agricultural Land into a Caravan and camping site. Planning Policy Wales (PPW) requires that BMV agricultural land should be conserved as a finite resource for the future with considerable weight given to protecting it from development. Such land should only be developed if there is an overriding need for the scheme and either previously developed land or land in lower agricultural grades are unavailable. As such the proposal would fail to accord with Planning Policy Wales Edition 11 and Technical Advice Note 6.

4. The proposal is not located within a sustainable location and the increase in 10 pitch units would result in an increase in car usage which is contrary to the principles of Planning Policy Wales Edition 11, Policy 29 (Sustainable Design) and Policy 59 (Sustainable Transport).

5. The proposal fails to protect the sense of remoteness and tranquillity, and the identity and character of the historic settlement adjacent, and the pattern and diversity of the landscape, contrary to Policy 8 of the Local Development Plan 2.

Environmental impacts relating to biodiversity and local highway improvements can be mitigated via the application of relevant planning conditions and are thus in accordance with relevant policies of the LDP2.

Recommendation

Refuse for the following reasons:

The proposed caravan site as submitted fails to accord with Local and National Planning policy in the following respects:

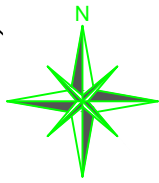
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2. The proposed additional pitches and track would result in a visual intrusion into the landscape of the National Park which is identified in this location as having a medium/high sensitivity with limited capacity for medium static site proposals. This would be contrary to the provisions of Policy 8 (Special Qualities), Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and the

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Authority's Supplementary Planning Guidance Document on Caravan, Camping and Chalets adopted May 2021.






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4. The proposal is not located within a sustainable location and the increase in 10 pitch units would result in an increase in car usage which is contrary to the principles of Planning Policy Wales Edition 11, Policy 29 (Sustainable Design) and Policy 59 (Sustainable Transport).
5. The proposal fails to preserve or enhance the special qualities of the National Park, contrary to the aims of Policies 8 and 14 of the Local Development Plan 2 and contrary to the adopted Supplementary Planning Guidance on Landscape Character.

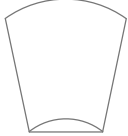
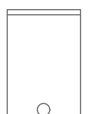


Proposed site area



Tretio Caravan Park

Existing Operation

-  Managers mobile chalet, previously consented
-  Tent site with permanent hook-ups (Pitches 1 to 22)
-  Tent site with predominantly no hook-ups (Pitches 23 to 46) (1 hook-up at pitch 24)
-  Play area for caravan aprk
-  30 holiday static caravans

 Beaumaris midi bat boxes
 Bird box

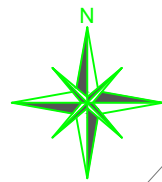
Install Beaumaris midi bat box and bird boxes to existing campsite facilities buildings

 Land in client ownership highlighted thus
 Proposed location of new holiday units
 Site Area - 20303 msq


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Change of Use of Pitch & Put Area to Expansion with Ten Self-Contained Bespoke Mobile Lodges/Caravans and Car Parking Tretio Caravan & Camping Park Ltd, St Davids, Pembrokeshire

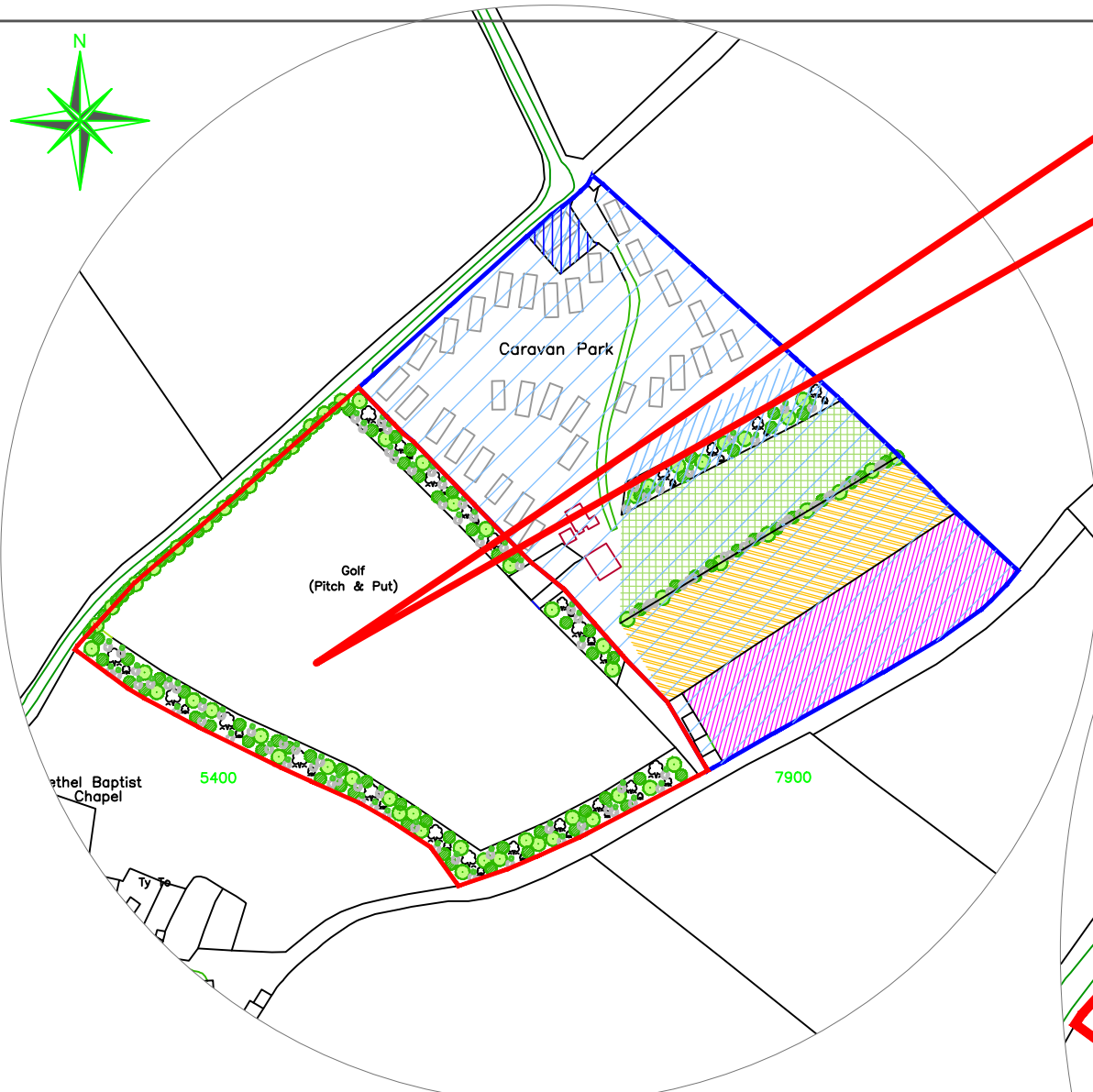
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Drawing Title Expanded Location Plan					Dwg No. Page 37 of 91 01a








Site Plan - Scale 1:1000



Proposed site area

Proposed site area



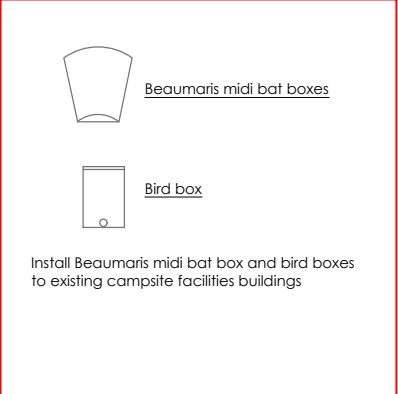
Location Plan
Scale 1:2500

-  Managers mobile chalet, previously consented
-  Tent site with permanent hook-ups (Pitches 1 to 22)
-  Tent site with predominantly no hook-ups (Pitches 23 to 46) (1 hook-up at pitch 24)
-  Play area for caravan aprk
-  30 holiday static caravans

-  Land in client ownership highlighted thus
-  Proposed location of new holiday units
Site Area - 20303 msq



Baptist
5400
Install Beaumaris midi bat box and bird boxes to existing campsite facilities buildings



Beaumaris midi bat boxes

Bird box

Install Beaumaris midi bat box and bird boxes to existing campsite facilities buildings



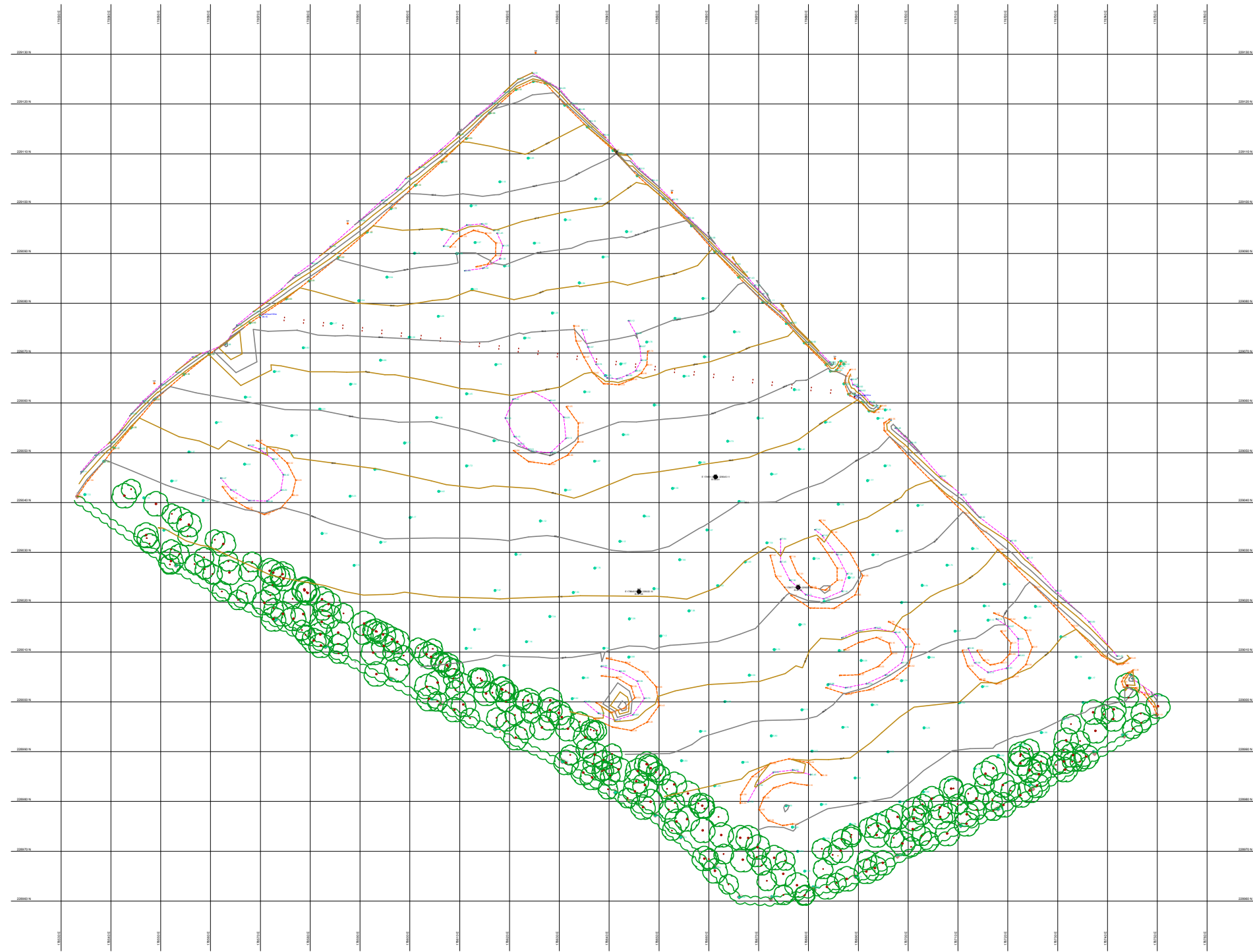
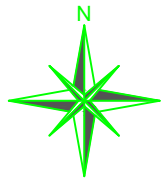
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Designed by	Checked by	File name AVH_731	Date 08.02.2022	Scale A3 As Shown	Client Mr Bryn Rees and Mr Phil Rees
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Drawing Title
Location Plan

Dwg No.
Page 38 of 91 **02a**



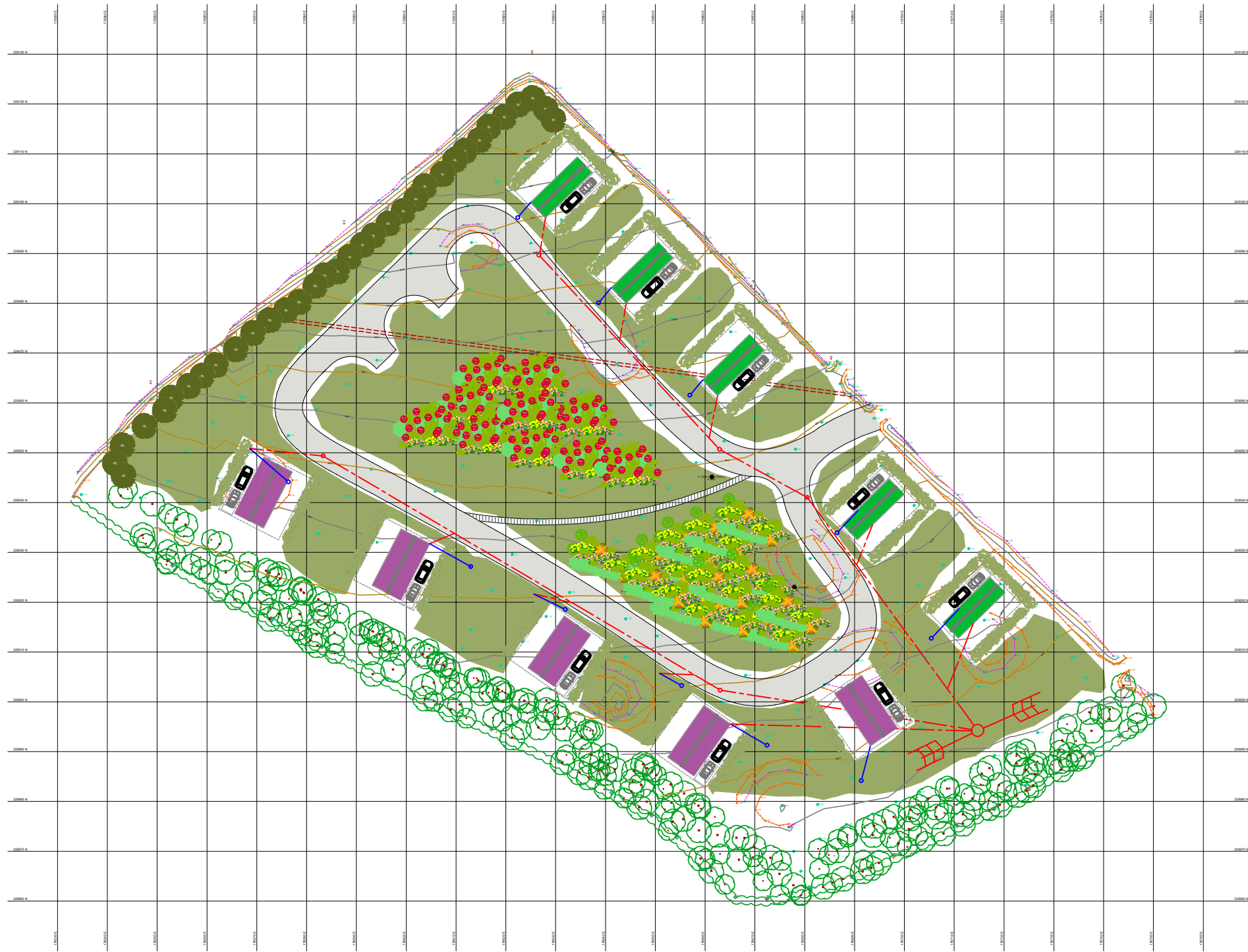
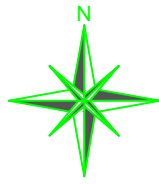
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Designed by	Checked by	File name AVH_731	Date 08.02.2022	Scale A3 @ 1:1000	Client Mr Bryn Rees and Mr Phil Rees
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Drawing Title
Overall Topographical Survey of Pitch & Put Course

Dwg No.
Page 39 of 91 **03a**



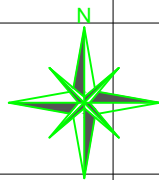
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Designed by	Checked by	File name AVH_731	Date 08.02.2022	Scale A3 @ 1:1000	Client Mr Bryn Rees and Mr Phil Rees
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Drawing Title
Overall Site Plan

Dwg No.
Page 40 of 91 **04b**



Proposed tree planting of native species to act as screening

Pedestrian link to main caravan park site of crushed, permeable, well compacted stone

Proposed earth hedgebank between units planted with native species to act as screening

Indicative location of proposed Edmunton style holiday unit

Foul drainage to bespoke package treatment plant with clarified discharge to drainage field

Existing trees and hedgerows to remain un-altered throughout site to remain

Indicative location of proposed Vendee style holiday unit

Proposed earth hedgebank planted with native species

Proposed earth hedgebank planted with native species

Proposed dedicated parking bespoke for each holiday unit

Existing field access point

Link to existing Tretio caravan park

Proposed access to be of permeable compacted crushed stone

Roof water from each unit to bespoke soakaway

Wildflower meadow

Wildflower meadow



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Designed by

Checked by

File name
AVH_731

Date
28.02.2023

Scale
A3 @ 1:500

Client
Mr Bryn Rees and Mr Phil Rees

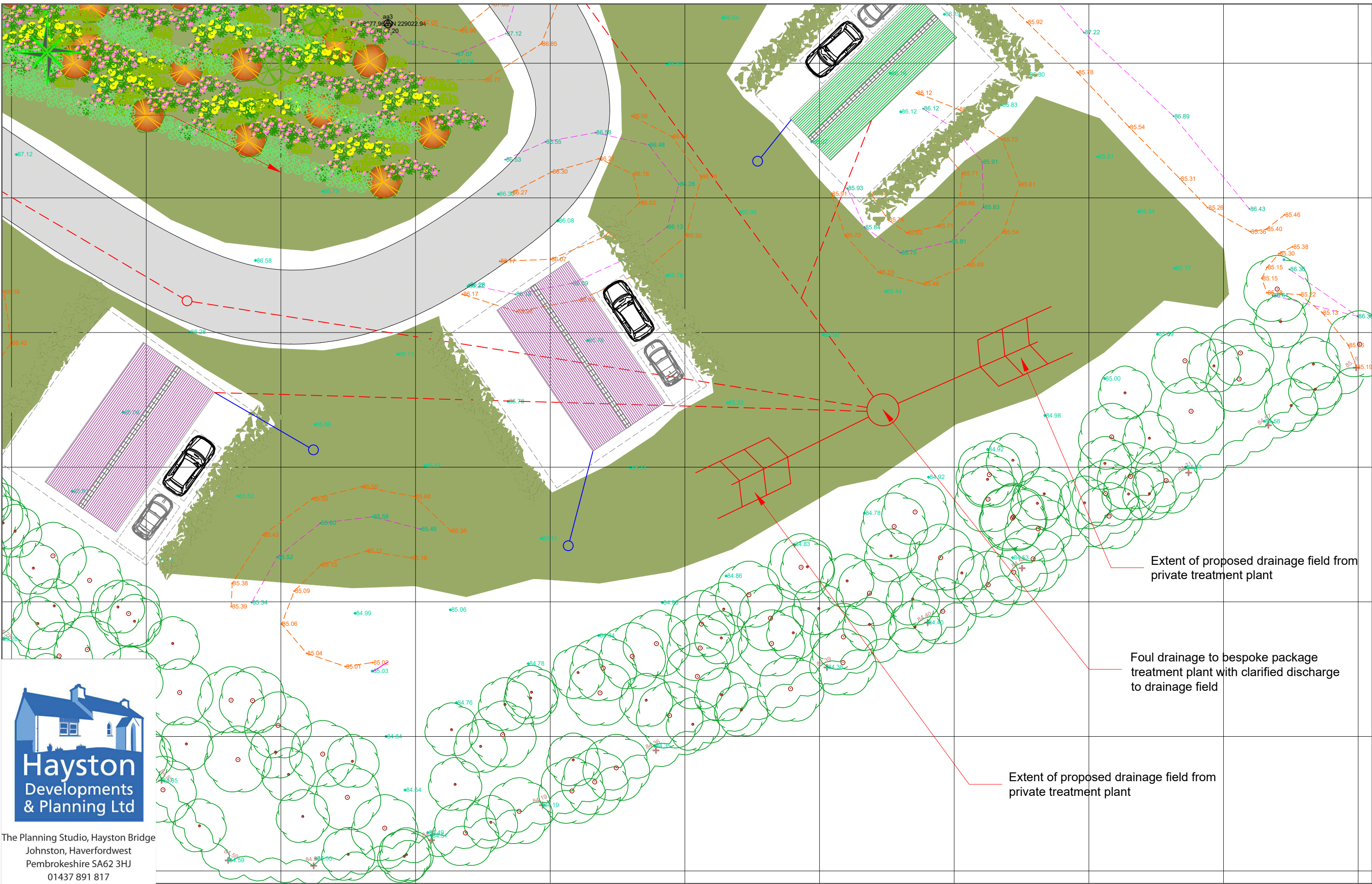
Drawing Title

Proposed Site Plan

Dwg No.

Page 41 of 91

05c



Extent of proposed drainage field from private treatment plant

Foul drainage to bespoke package treatment plant with clarified discharge to drainage field

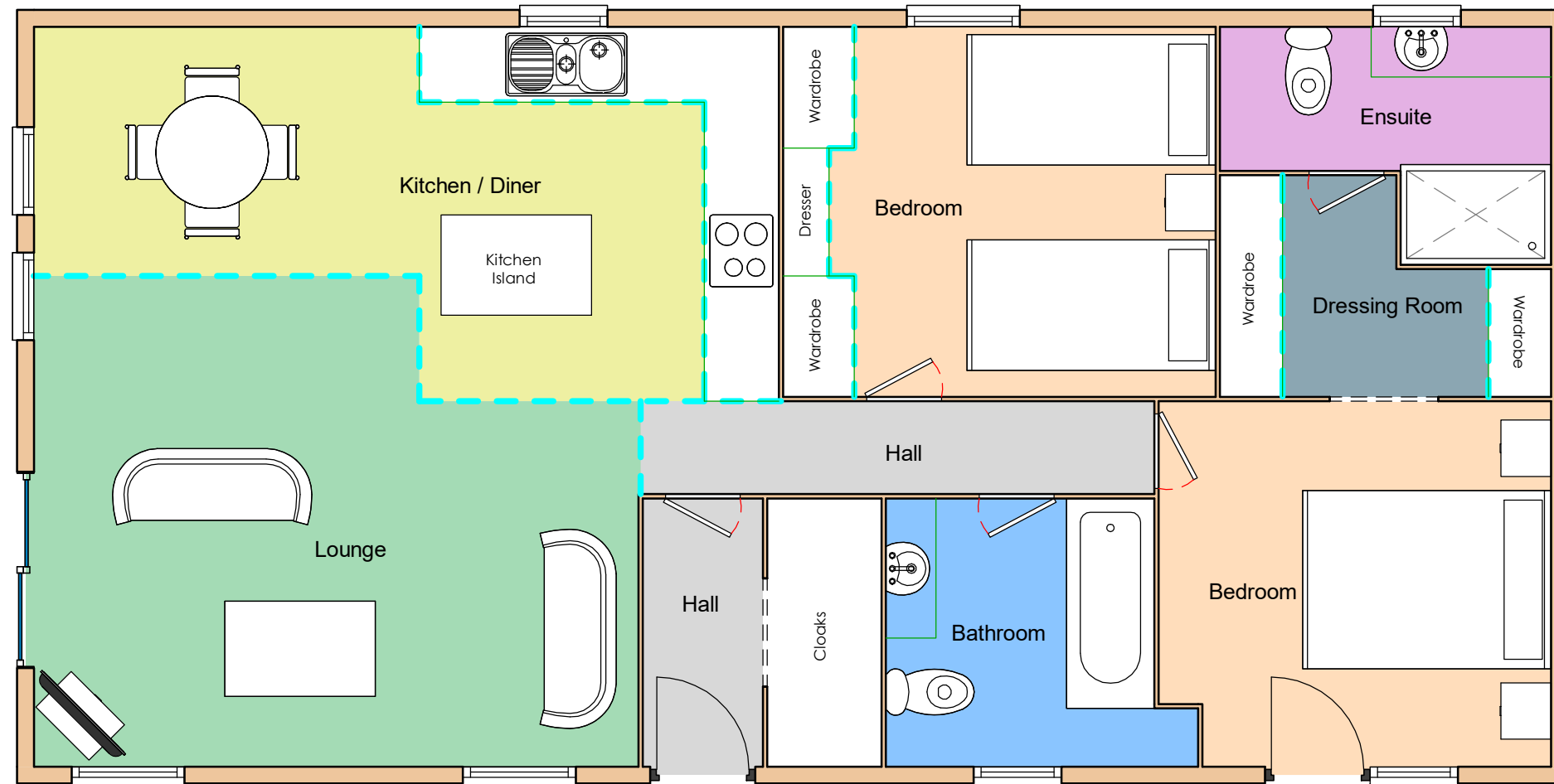
Extent of proposed drainage field from private treatment plant



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Designed by	Checked by	File name AVH_731	Date 28.02.2023	Scale A3 @ 1:250	Client Mr Bryn Rees and Mr Phil Rees
Drawing Title Expanded Site Plan Showing Extent of Drainage Field in Context					Dwg No. Page 42 of 91 14



Room Legend

- Bathroom
- Bedroom
- Dressing Room
- Ensuite
- Hall
- Kitchen / Diner
- Lounge



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No.	Description	Date

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 Bespoke Mobile Lodges/Caravans and Car Parking
 Tretio Caravan & Camping Park Ltd,
 St Davids, Pembrokeshire
 Mr Bryn Rees and Mr Phil Rees**

Edmunton Mobile Lodge/Caravan Floor Plan (5 in total)	
Project number	AVH731
Date	08.02.2022
Drawn by	'
Checked by	'
Scale	1 : 50

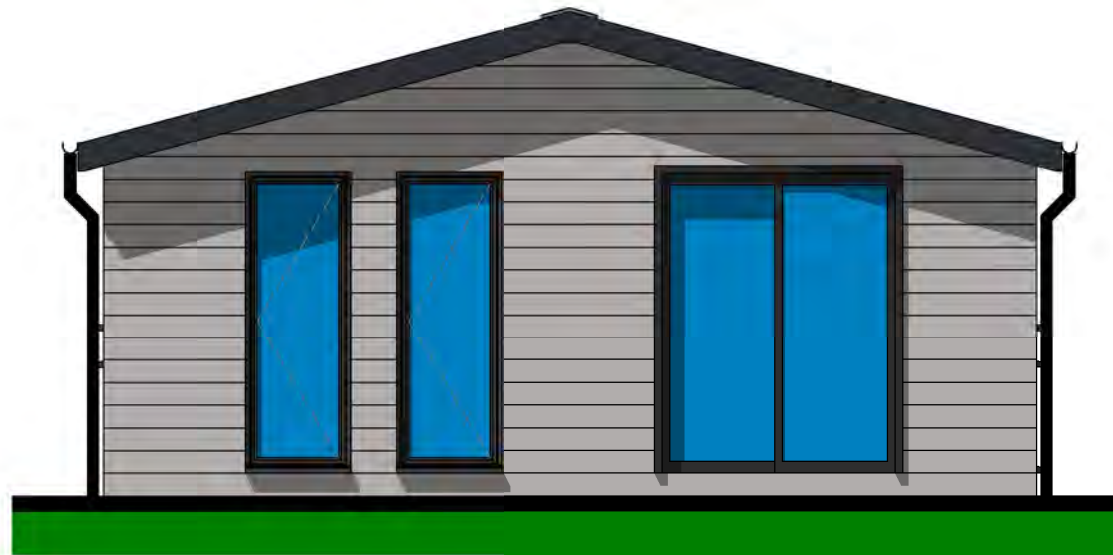
10b

08/02/2022 09:39:52



Right Side

This is a mobile lodge/caravan meeting the definition of a caravan under the 1968 Act and 2006 Order



Front

EXTERNAL FINISHES

1.	Roof Covering	Blue / black coated steel pantile roof
2.	Walls	CanExel high density wood composite cladding - Mist grey in colour
3.	Rain Water Goods	Black uPVC half round guttering with circular downpipes

4.	Windows	uPVC or metal - anthracite in colour
5.	Doors	uPVC or metal - anthracite in colour



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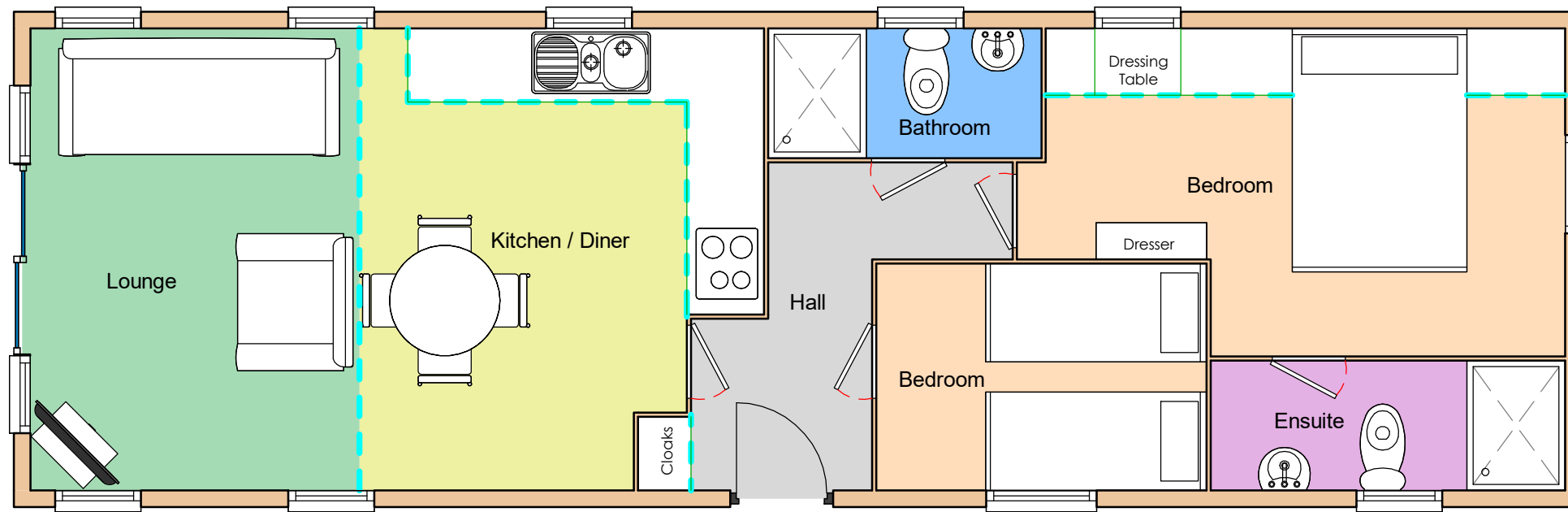
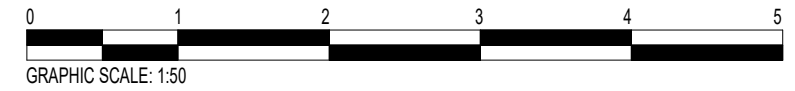
No.	Description	Date

Change of Use of Pitch & Put Area to Expansion with Ten Self-Contained Bespoke Mobile Lodges/Caravans and Car Parking
Tretio Caravan & Camping Park Ltd,
St Davids, Pembrokeshire
Mr Bryn Rees and Mr Phil Rees

Edmunton Mobile Lodge/Caravan Elevations (5 in total)	
Project number	AVH731
Date	08.02.2022
Drawn by	'
Checked by	'
Scale	1 : 50

11a

08/02/2022 09:40:15



Room Legend

- Bathroom
- Bedroom
- Ensuite
- Hall
- Kitchen / Diner
- Lounge



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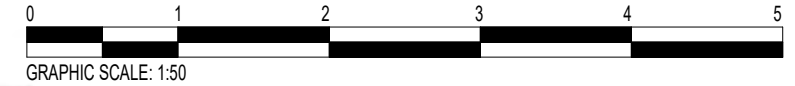
No.	Description	Date

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 Bespoke Mobile Lodges/Caravans and Car Parking
 Tretio Caravan & Camping Park Ltd,
 St Davids, Pembrokeshire
 Mr Bryn Rees and Mr Phil Rees**

Vendee Mobile Lodge/Caravan Floor Plan (5 in total)	
Project number	AVH731
Date	08.02.2022
Drawn by	'
Checked by	'
Scale	1 : 50

06b

08/02/2022 09:31:13



Right Side



Front

This is a mobile lodge/caravan meeting the definition of a caravan under the 1968 Act and 2006 Order

Ceiling height less than 3.05m meeting the definition of a caravan under the 1968 Act and 2006 Order

EXTERNAL FINISHES

1.	Roof Covering	Blue / black coated steel pantile roof
2.	Walls	CanExel high density wood composite cladding - Mist grey in colour
3.	Rain Water Goods	Black uPVC half round guttering with circular downpipes

4.	Windows	uPVC or metal - anthracite in colour
5.	Doors	uPVC or metal - anthracite in colour



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No.	Description	Date	Change of Use of Pitch & Put Area to Expansion with Ten Self-Contained Bespoke Mobile Lodges/Caravans and Car Parking		Vendee Mobile Lodge/Caravan Elevations (5 in total)		
			Tretio Caravan & Camping Park Ltd, St Davids, Pembrokeshire		Project number	AVH731	
					Date	11.09.2023	07c
					Drawn by	'	
					Checked by	'	
							Scale



Left Side



Rear

This is a mobile lodge/caravan meeting the definition of a caravan under the 1968 Act and 2006 Order

Ceiling height less than 3.05m meeting the definition of a caravan under the 1968 Act and 2006 Order

EXTERNAL FINISHES

1.	Roof Covering	Blue / black coated steel pantile roof
2.	Walls	CanExel high density wood composite cladding - Mist grey in colour
3.	Rain Water Goods	Black uPVC half round guttering with circular downpipes

4.	Windows	uPVC or metal - anthracite in colour
5.	Doors	uPVC or metal - anthracite in colour



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Tretio Caravan & Camping Park Ltd,
St Davids, Pembrokeshire
Mr Bryn Rees and Mr Phil Rees

Vendee Mobile Lodge/Caravan Elevations (5 in total)	
Project number	AVH731
Date	11.09.2023
Drawn by	'
Checked by	'
Scale	1 : 50





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					Project number	AVH731
					Date	08.02.2022
					Drawn by	'
					Checked by	'
					Scale	

09b