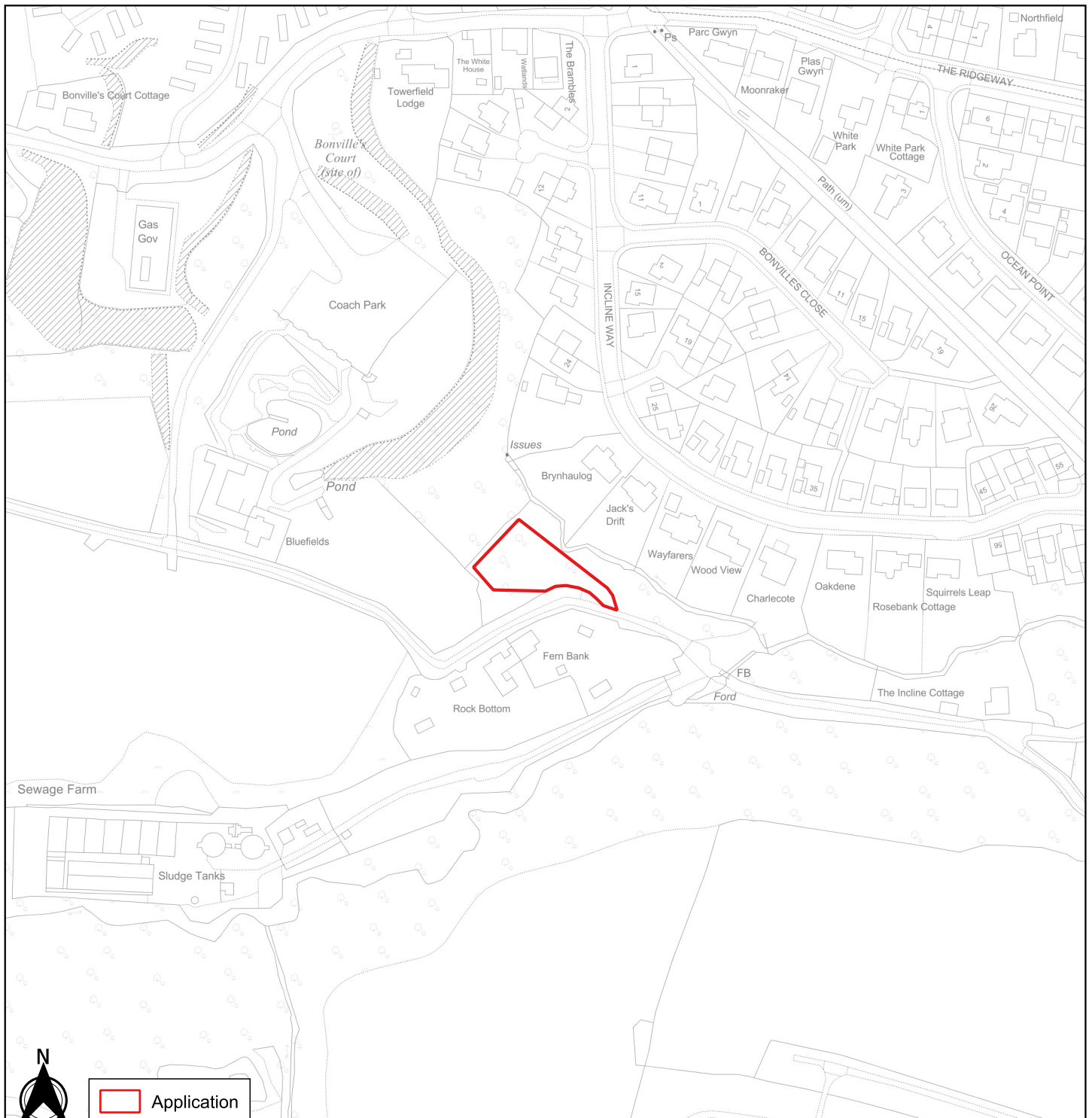
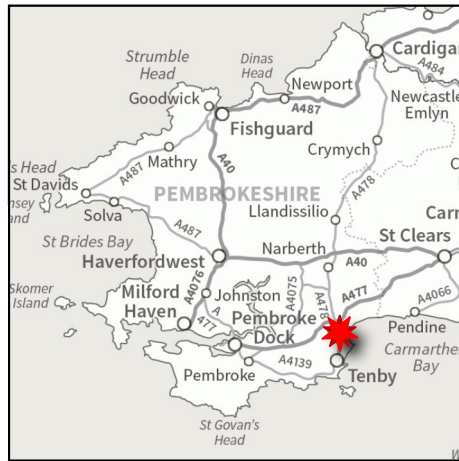




Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

Graddfa/Scale: 1:2,500



# PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



**Ref No:** NP/24/0638/FUL  
**Proposal:** The creation of one traveller site incorporating one static caravan, one touring caravan, day/utility room & ecological enhancements (partly retrospective)  
**Site Location:** Land at Froghall Yard, Moreton Lane, Saundersfoot, Pembrokeshire, SA69 9JG

**Recommendation: Refuse**

**A site visit by the Development Management Committee is scheduled to take place prior to consideration of this report by Members.**

**The application is being brought to the Development Management Committee in accordance with the scheme of delegation as it has been called in by the Local Member.**

The full plans and associated documents can be viewed online via the following link [Citizen Portal Planning - application details](#)

## **Summary:**

The main issues are whether the need for the additional traveller caravan site provision in the area and circumstances of the applicant outweigh any harm caused to the character and appearance of the National Park.

The Pembrokeshire Gypsy Traveller Accommodation Assessment 2019 (GTAA) identified an immediate need for nine pitches by the end of 2024 which has been met and there is a remaining, unmet need for 25 pitches over the period 2025 to 2033.

The GTAA 2019 did not identify a need for pitches in the National Park and Pembrokeshire County Council is making provision for an additional 55 pitches in its LDP 2, which is due to be submitted for examination in June 2025 and for adoption in May 2026.

The applicant has existing accommodation and is not currently homeless. Moderate weight has therefore been given in the report below, to the existing level of outstanding unmet need for Gypsy Traveller accommodation in Pembrokeshire. That level of need should be weighed against the likely impact of development on the National Park landscape and habitat in this area.

The proposed location of the site is within a Landscape Character Area (LCA1) which has been assessed as having no further capacity to accommodate new caravan development (Caravan, Camping and Chalet Supplementary Planning Guidance adopted May 2021). Whilst the proposal involves one proposed static caravan and one touring caravan together with an associated utility room all for residential use, officers consider that further caravan development in this LCA of any type would exceed landscape capacity. This would contribute to a cumulative adverse impact within this Landscape Character area.

There has also been significant site clearance undertaken prior to the submission of the application, and the impact on the landscape, biodiversity and ecosystem resilience has been assessed as negative with uncertainty over the definite impact due to the lack of

baseline assessment prior to clearance. The Authority has served an Enforcement Notice on the site, which requires its return to its previous condition.

The report therefore recommends refusal of the application on the basis of landscape impact and potential harm through loss of habitats and inadequate Green Infrastructure provision. The lack of wider landscape capacity to accommodate further caravan development in this Landscape Character Area also constitutes a reason for refusal.

### **Consultee Response**

- Saundersfoot Community Council – Object on location, biodiversity, access, precedent and no local connection
- PCNPA Ecologist – Further information required in the form of a preliminary Ecological Appraisal
- PCNPA Tree and Landscape officer – Further information required on Green Infrastructure Statement
- PCNPA Access team – No objection subject to informative
- PCC Drainage Engineers – Conditional consent and informative
- PCC Transportation and Environment – Conditional consent and informative
- Cadw – No response received at time of report drafting
- Dwr Cymru Welsh Water – Conditional consent and informative
- Wales and West Utilities – No response received to date
- Western Power – No response received to date

### **Public Response**

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

A significant number of representations have been received together with a petition carrying approx. 300 names, and the concerns / objections within the representations received are summarised below:

- Loss of landscape features including mature trees resulting in loss of habitat including badge habitat
- Proximity of development to the stream
- Impact on the statutory duty of the National Park
- Current access not adequate for this development
- Change of use of agricultural land inappropriate
- Proposal will create a precedent
- Impact on local nature
- Proximity to existing residential developments
- Development is outside of settlement boundary
- There is no need identified which applies to the applicant
- Planning statement is incorrect as no historical Gypsy use of the site and that the applicants have a local connection.
- Proposal is contrary to LDP2 Policies 7 and 53 (criterion c, e & f) and PWW 12 (Paragraphs 6.3.5 – 6.3.9)
- Impact on Special Qualities
- Impact from loss of trees and provision of new hard standing
- No lawful historic use of the site identified
- Site has already been formalised with residential features including buildings, fences and hardstandings which are visually prominent

- Change in character from rural to urban resulting in adverse impact on visual amenity
- The tree report submitted only indicates that the development will not impact on the adjacent TPO areas, but does not mention the loss of the trees to create the development
- No net benefit considered appropriate without a baseline being considered as part of application
- The development has resulted in an adverse impact on the ecological value of the site, and it has not demonstrated there has been no impact on protected species
- Concerns raised on foul water connection to public sewage system against objection on previous application
- Level of information on proposed soakaway insufficient
- Noise disruption and light pollution from the development site
- Potential for the land to be expanded to accommodate further pitches
- Japanese knot weed present on the site and robust management plan required to deal with this
- Lack of an adequate water supply
- Impact on privacy and amenity
- Postcode for site is incorrect
- Availability of other alternative sites
- Impact on local services including healthcare
- Loss of property value
- Impact on village community
- Potential for anti-social behaviour

Where material, these concerns are discussed in the main body of this report.

## **Policies considered**

### National Policy

All planning applications in Wales need to be determined in accordance with the statutory National Development Plan:

- [Future Wales: The National Plan 2040](#) (FW)
- [Planning Policy Wales 12](#) (PPW12).

### Welsh Government Circulars

- Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites' (June 2018)

### Technical Advice Notes

The Future Wales Plan should be seen and read as a whole, and in conjunction with National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) as well as considering the following Welsh Government Technical Advice Notes (TAN's)

[www.gov.wales/technical-advice-notes](http://www.gov.wales/technical-advice-notes):

- TAN 2 – Planning and Affordable Housing
- TAN 5 – Nature Conservation and Planning
- TAN 6 – Planning for Sustainable Rural Communities
- TAN 10 – Tree Preservation Orders
- TAN 12 - Design
- TAN 15 – Development and Flood Risk
- TAN 18 – Transport
- TAN 24 – The Historic Environment

Local Development Plan 2 (Adopted September 2020)

Additionally, within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also the relevant development plan with the following policies being applicable to this proposal:

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 41 (Caravan, Camping and Chalet Development)
- Policy 53 (Gypsy Traveller and Showpeople Sites)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of Pembrokeshire Coast National Park website: <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/01/LDP-Text-for-Adoption-Web.pdf>

#### LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, and these may be material considerations in the determination of any future application made. In respect of the proposal the most relevant SPG's are:

- Archaeology
- Biodiversity
- Caravan Camping and Chalet
- Coal Works
- Parking Standards
- Sustainable Design & Development
- Trees and Woodlands
- Landscape

#### Constraints

- Tree Preservation Order
- Rights of Way Inland - within 50 metres
- Ancient Monument - within 500 metres
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- Affordable Housing Submarkets
- Landscape Character Area

#### Relevant Planning History

- NP/320/851 – Outline application for a bungalow was refused in September 1985

- NP/29/94 – Outline application for a detached dwelling was refused in February 1994
- PA/21/0114 (Pre-application enquiry) – Proposed 2 storey dwelling and detached 3 car garage – Response sent with recommendation of refusal
- Temporary Stop Notice issued on 19<sup>th</sup> July 2024, requiring landowner to:
  - Cease the use of the land for the siting of a mobile home for residential and/or storage purposes; and
  - Remove the drainage pipes and any associated apparatus present from the land
- Stop Notice issued 14<sup>th</sup> August 2024 including the same information as the Stop Notice and requiring that all activity specified in the notice cease.
- Enforcement Notice - Issued on 14<sup>th</sup> September 2024 with effect from 20<sup>th</sup> September, including the same information above as stated in the Temporary Stop Notice and Stop Notice. The Enforcement Notice describes the planning breach as  
*“Without planning permission, the making of a material change of use of the Land from woodland to a mixed use of woodland and for residential and/or storage use of a mobile home and caravan and the carrying out of associated engineering operations comprising the laying of drainage pipes and services and associated groundworks.”*

The Actions required by the Enforcement Notice are:

- i) Permanently cease the use of the Land for the siting of a mobile home and caravan for residential and/or storage purposes;
- (ii) Permanently remove from the Land the mobile home and caravan and all associated works, drainage pipes and any associated apparatus present from the land; and
- (iii) Restore the Land to its former condition before the breach took place.

A period of 6 weeks for compliance was set out in the Notice.

- Enforcement Appeal starting 26<sup>th</sup> September 2024 - Lodged on Ground G. A ground G appeal is issued on the basis that the period for compliance with the notice is too short.
- Appeal Decision on 20/03/2025 - Appeal Dismissed and Enforcement Notice upheld - Enforcement Case is currently open.

## 1. Officer's Appraisal

### Site and Proposed development

1. The site is located to the west of Saundersfoot and falls within Landscape Character Area 1 – Saundersfoot Settled Coast, the site is also immediately adjacent to the Centre Boundary.
2. Seven properties are located in close proximity to the application site with five of those lying to the north-east within Incline Way and which have their rear gardens backing on to the site. Two further adjacent properties are located on the opposite side of Moreton Lane which also provides access to the application site with a sewage treatment works located further to the south-west.



3. The application site has an area of approximately 1013 square metres and land that slopes gently from the north-west to the south-east. Moreton Lane also forms a Bridleway (42/44) with access from Saundersfoot to Valley Road and further west to the A478 road.

### **Current Proposal**

4. The current proposal seeks approval for a development consisting of a change of use of land for residential use as a traveller site incorporating:
  - one static caravan,
  - one touring caravan
  - a detached day/utility room
5. The current description also includes a reference to ecological enhancements and also refers to the development being partly retrospective.

## **2. Key Issues**

The application raises the following planning matters:

- 2.1. Policy and Principle of Development
- 2.2. Siting, Design, and Impact upon the Special Qualities of the National Park
- 2.3. Amenity and Privacy
- 2.4. Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 2.5. Access and Parking
- 2.6. Foul and Surface Water Drainage
- 2.7. Green Infrastructure
- 2.8. Delete and/or insert any other key issues relevant to this application

### **2.1. Policy and Principle of Development:**

6. Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).
7. Future Wales – The National Plan 2040 (FW), was adopted on 24th February 2021 and is the National Development Framework for Wales, and the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) of FW states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them.
8. On page 104, Future Wales states that: 'National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...'.  
'
9. The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

10. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.
11. The Well-being of Future Generations (Wales) Act 2015 sets well-being goals which include: 'a Wales of cohesive communities' and 'a Wales of vibrant culture and thriving Welsh language'
12. Section 149 of the Equality Act 2010 prohibits racial discrimination by planning authorities in carrying out their planning functions. In addition, the majority of public authorities, including local authorities, have a general duty under the 2010 Act to actively seek to eliminate unlawful discrimination and to advance equality of opportunity and foster good race relations in all they do. The twin pillars of the traditional way of life of Gypsy Travellers – namely nomadism and the occupation of caravans – receive a significant degree of protection under the Human Rights Act 1998 ("HRA 1998"), which, by virtue of s1 and Schedule 1, gives further effect to Articles 1 of Protocol 1, and Articles 8 and 14 of the European Convention on Human Rights ("ECHR" or "Convention") as rights protected in national law. Article 1 of Protocol 1 gives a right to peaceful enjoyment of possessions and protection of property. Article 8 ensures respect for home, private and family life. Article 14 requires the Authority to secure equal enjoyment of other Convention rights without discrimination on grounds of status.
13. This application seeks permission, partly in retrospect for a traveller site. The site lies outside of, but adjacent to the settlement boundary for Saundersfoot, which is defined as a Local Centre in the Local Development Plan 2 (LDP2). The location is therefore classified as Countryside, where development must be strictly controlled.
14. The site also falls within Landscape Character Area 1 – Saundersfoot Settled Coast. The site being immediately adjacent to the Centre Boundary, seven properties are located in close proximity to the application site with five of those lying to the north-east within Incline Way and have their rear gardens backing on to the site. Two further adjacent properties are located on the opposite side of Moreton Lane which also provides access to the application site with a sewage treatment works located further to the south-west. The application site has an area of approximately 1013 square metres and land that slopes gently from the north-west to the south-east. Moreton Lane also forms a Bridleway (42/44) with access from Saundersfoot to Valley Road and further west to the A478 road.
15. Saundersfoot Community Council (SSC) object to the current application on the grounds that the location is inappropriate and conflicts with National Park Purposes. They indicate that the site is agricultural land and that there has been no caravan or other alternative use in over 30 years. SSC indicate that they consider the site to have been a previously unspoilt location which is an important part of the landscape setting of the village.
16. SSC claim that the development will conflict with the statutory purpose of the National Park, conserving and enhancing the natural beauty, wildlife and cultural heritage of the area. In addition, they indicate that the site falls outside of the settlement boundary which conflicts with LDP2 and that two previous planning applications have been refused on this site and the Authority should be consistent with previous decisions.



## Definition of Gypsies and Travellers

17. Section 108 of the Housing (Wales) Act 2014 defines Gypsies and Travellers as:
  - a) Persons of a nomadic habit of life, whatever their race or origin, including –
    - (i) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and
    - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such), and
  - b) All other persons with a cultural tradition of nomadism or of living in a mobile home.
18. Paragraph 3 of Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites' (June 2018) advises that members of the Gypsy and Traveller community do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers.
19. The submitted information provided in the supporting statement to the application states that the applicant was born at a Gypsy and Traveller site and is a Romany Gypsy and that his lifestyle falls within the definition of Gypsies in Paragraph 2 of Circular 005/2018.
20. LDP2, Policy 7 'Countryside' seeks to strictly control development outside the identified Centres. Policy 7 sets out the types of development that are acceptable, in principle. Criterion (I) supports in principle, the need for a Gypsy and Traveller site in a countryside location, subject to criteria in Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2 which sets out a range of criteria for assessing proposals for new sites.

## Gypsy and Traveller Accommodation Needs in Pembrokeshire

21. Criterion a) of Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2, requires the demonstration that there are no suitable pitches available within existing authorised sites or land available within existing settlement limits. Information has been provided from Pembrokeshire County Council (PCC) Housing Department (March 2025) which states there are 84 local authority managed pitches in Pembrokeshire. There are six void pitches, two of which are not fit for purpose and four which have unauthorised encampments. There are 63 people on the waiting list for a pitch. There is one existing private site with planning permission in the National Park. There is no planned provision for new or enlarged Gypsy and Traveller sites in the National Park.
22. The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and that the identified need for pitches is met. Section 101 of the Housing (Wales) Act 2014 requires the local authority to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to its area. In Pembrokeshire, this duty falls on Pembrokeshire County Council in its role as the local housing authority.
23. The Gypsy and Traveller Accommodation Assessment (GTAA) for Pembrokeshire, which includes the National Park was prepared in 2019 and approved by the Welsh Government (WG) on 24 May 2024<sup>1</sup>. The GTAA 2019 identified an immediate need for nine residential pitches over the five-year period 2019 to the end of 2024, with a net

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<sup>1</sup> [LDP2 Evidence Base - Pembrokeshire County Council](#)

additional need of 30 pitches over the period 2025 to 2033. The locations identified by people in need are generally within the south of the county with Haverfordwest providing the furthest location to the north. There is no specific identified need for pitches in the National Park as the assessment is carried out on a County wide basis.

24. The Housing (Wales) Act 2014 requires the local housing authority to carry out a GTAA every five years. The local housing authority was required to undertake the GTAA in 2024 but has been advised by the WG to delay undertaking a new GTAA until revised guidance has been published by the WG.
25. Information from PCC has confirmed that the immediate need for 9 pitches was met by the end of 2024 and that 14 pitches had been granted permission in the period 2019 to the end of March 2025, plus one travelling show person's yard. The GTAA identified an additional need for 30 pitches over the period 2025 to 2033, and taking into account the surplus of 5 pitches which have planning permission this need is reduced to 25 pitches. There is one planning appeal with PEDW awaiting determination for two pitches at Pincheston Farm, Sageston (PCC planning application reference 24/0061/PA).
26. The adopted LDP2 for the National Park does not identify any site allocations for Gypsy and Traveller pitches as no need was identified in the 2015 Gypsy Traveller Accommodation Need Assessment (GTANA) in the Pembrokeshire Coast National Park. The GTAA 2019 did not identify a need for pitches within the National Park. Nevertheless, in light of the County wide need, LDP2, policy 53 'Gypsy, Traveller and Showpeople Sites' sets out a criteria-based policy for assessing applications for new Gypsy, Traveller and Showpeople sites to ensure the Authority plays its part in addressing unmet need, where appropriate.
27. PCC adopted LDP (adopted 2013) allocated two sites for Gypsy and Travellers in Policy GN.31 'Gypsy Traveller Sites and Pitches Allocation'. Since adoption of PCC's LDP in February 2013, three pitches have been delivered at Castle Quarry (in 2014-15) and 10 pitches were completed at Kingsmoor, Kilgetty in February 2022. Both these sites are local authority owned and managed. As stated above, 14 private pitches have been granted planning permission in PCC's planning jurisdiction since 2019.
28. PCC consulted on its re-Deposit LDP2 from 21 October until 16 December 2024. The Re-Deposit LDP2 identifies four allocations to deliver 55 additional pitches for Gypsy and Traveller sites in policy GN 24. This provision would meet the need identified in the GTAA 2019.
29. PCC Policy GN 24 Gypsy and Traveller Site Allocations are as follows:

#### GN 24 Gypsy and Traveller Site Allocations

Land is allocated for extensions to the Gypsy and Traveller sites at four locations, each shown on the Proposals Map:

Site Reference	Site Name	Area (hectares)	Indicative net gain of pitch number
GT/095/LDP2/01	Land to the east of Castle Quarry Gypsy and Traveller site, Monkton, Pembroke	0.35	4
GT/003/LDP2/01	Land west of Kingsmoor Common Gypsy and Traveller site, Begelly	0.58	11
GT/040/LDP2/01	Land east of Withybush Gypsy and Traveller site	1.21	20
GT/095/LDP2/02	Adjacent to Monkton Playing Field	2.43	20 (with potential for further pitches beyond the Plan period)

Indicative net gain of pitch numbers at the three sites: 55

5.130 Land is identified to provide a net gain of 55 pitches through the extension to the existing, well established Local Authority managed Gypsy and Traveller sites at Castle Quarry, Monkton, Pembroke, Kingsmoor Common, Begelly and Withybush. In addition to these, a new site has been identified for such provision, at Monkton Playing Fields. Details on the delivery of the sites, including indicative costs, possible funding sources and expected timescales for delivery has been included in the Development Sites and Infrastructure Supplementary Planning Guidance.

5.131 At Castle Quarry and Withybush, the extension of the sites may take place in conjunction with improvements to the existing sites. At Kingsmoor, a consented plot is likely to be needed to allow extension of the internal road layout. The site Adjacent to Monkton Playing Fields site will provide new pitches and might also have potential for partial use as a transit site should such a need be identified.

30. The WG representation<sup>2</sup> to PCC's Re-Deposit consultation supports policy GN24 and reads: "The Welsh Government supports this policy as it meets the needs identified in the plan/evidence base (2019 GTAA signed off in 2024). Whilst the date of the evidence base and relationship to the date of the examination could raise question, the Welsh Government considers there is sufficient flexibility, i.e. overprovision of pitches, to provide confidence in that the level of need will be met."

#### Gypsy and Traveller Caravan Count

31. The Gypsy and Traveller caravan count from July 2024<sup>3</sup> recorded Pembrokeshire as having 141 caravans, of which 137 are authorised. Table 1 recorded 93 caravans on authorised sites run by the local authority and 44 caravans on authorised private rented sites. Table 2 recorded 5 authorised local authority sites in Pembrokeshire and 19 authorised private sites. This is the highest number of authorised sites in Wales. Table 3 showed there are 79 occupied residential pitches provided by the local authority and 4 vacant residential pitches. It is noted however, there may be an error

<sup>2</sup> [Local development plans: government responses | GOV.WALES](#)

<sup>3</sup> [Gypsy and Traveller caravan count: July 2024 \[HTML\] | GOV.WALES](#)

in the reporting as the number of pitches in table 3 totals 83, however table 1 recorded 93 pitches.

32. Case law has shown that there is no requirement for the applicant to prove a need to live specifically on the proposed site, or that no other site is available. The applicant is also not required to demonstrate a local connection or need to reside in the proposed location (see Paragraph 65 of Circular 005/2018). It is apparent from the supporting statement that the applicant and family are currently residing on a site known as Glascoed on the outskirts of Pontypool. Whilst this does not prevent them from seeking an alternative site, this is not a situation where there is a specific lack of accommodation for the applicant and his family or that they are currently homeless.
33. In an appeal against an enforcement notice issued by the Authority for the use of the site the Inspector wrote: *"In this case, it is clear that the appellant currently lives on a site known as Glascoed on the outskirts of Pontypool and following the purchase of the appeal site in October 2023 he intends for the appeal site to become his future home. The Council's evidence also indicates that the appellant does not currently live on the appeal site. As such, the requirements of the Notice to cease the use of the land for residential purposes would not displace the appellant or make him homeless and in need of finding alternative accommodation."* (paragraph 7). The appeal was dismissed. (Appeal reference CAS-03683-C2YOL6). Those circumstances continue to be the case.
34. Therefore, it is considered that whilst there is an outstanding need for Gypsy and Traveller pitches in Pembrokeshire, the GTAA 2019 did not identify any specific need within the National Park. The immediate, short-term need has been met and the need over the period 2025 to 2033 is being addressed by allocations in PCC's LDP2, which is timetabled for adoption in May 2026. As such, Officers recommend that moderate weight should be attached to the level of need for a site.
35. Criterion b) of Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2 requires the site to be well located to serve the needs of Gypsy, Travellers or Showpeople including the need to access local services. The proposed site is adjacent to the local centre of Saundersfoot which has a range of local services, including education and health facilities with a primary school and doctor's surgery and also access to shops. The site is therefore considered to be well located in accordance with criterion b.
36. Criterion c) of Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2 permits proposals where the site has good access to a public road which is safe and direct. The site is accessed from a non-classified road known as Moreton Lane. The Highways Authority has been consulted regarding the suitability of the road for access. It must also be taken into account that the Development Advice Maps show sections of Moreton Lane within flood zone C2. The Flood Map for Planning also shows sections of Moreton Lane within flood zone 3 (rivers and sea). There must be suitable access to and from the site for the applicants and also for emergency vehicles. The Highways Authority has not objected to the proposal and has noted that larger vehicles already travel along the route to reach their property / field but has suggested more information on access for emergency vehicles is necessary in the form of a swept path analysis. Officers consider that this information could be required via a Grampian condition and therefore this is not a reason for refusal (this aspect is discussed in greater detail below under Access).

37. Criterion d) of Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2 supports development where the site is suitable for the development and on-site services and facilities can be adequately provided. Paragraph 62 of Circular 005/2018 states "Gypsies and Travellers should always consult planning authorities on planning matters before buying land on which they intend to establish any caravan site, for which planning permission will almost always be required. It is disappointing that the applicants did not contact the local planning authority prior to the purchase of the site. Aerial photographs of the site show it to have dense vegetation and the supporting statement accompanying the application states the applicant purchased the application site in October 2023 and has removed a large amount of vegetation. The existing Enforcement Notice requires the restoration of the site to its former condition recognising that the vegetation clearance has landscape impacts and potential biodiversity impacts.
38. In accordance with Planning Policy Wales (Edition 12) and the Environment (Wales) Act 2016, every development must make a positive, net benefit for biodiversity. The Planning Ecologist has been consulted on the specific effects of the site clearance and any mitigation or restoration measures to repair damaged habitats or disturbed species, and this is detailed in the report below. All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state, prior to the clearance. Given the lack of ecological baseline information, this cannot currently be assessed, however even if this information were provided the Authority considers that the clearance of this site has resulted in unacceptable local landscape impacts within the countryside.
39. Criterion f) of Policy 53 ('Gypsy, Traveller and Showpeople Sites') of LDP2 states the proposal should not cause significant visual intrusion and should be sensitively sited in the landscape with satisfactory landscaping provided. Paragraph 37 of Circular 005/2018 sets out a list that should be considered when identifying new Gypsy and Traveller sites in a development plan. The list includes "*regard for areas designated as being of international, national and local importance for biodiversity and landscape.*" As discussed below in greater detail, the lack of capacity in the Landscape Character Area for further caravan development means that Officers do not consider the proposal complies with criterion f.
40. Overall Officers consider that whilst some elements of Policy 53 (Gypsy, Traveller and Showpeople Sites) are met by the proposal, that the proposal has not demonstrated that it meets criterion d or criterion f based on its landscape impacts and lack of information on potential harm to biodiversity and habitats. These points are discussed in further detail below.

## **2.2. Siting, Design, and Impact upon the Special Qualities of the National Park**

41. Policy 08 (Special Qualities), of 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. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique. Policy 8 also includes criterion g) which specifies that species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value.

42. Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.
43. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
44. A number of representors have raised concerns about potential impacts on landscape (both which have taken place on the retrospective element of the site) and which may take place if planning permission is granted, raising concerns that these would impact unacceptably on the Special Qualities of the National Park.
45. The National Park is a statutory landscape designation which has as its statutory purposes to conserve and enhance the national beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of the special qualities. Where there is a conflict between the two purposes, greater weight shall be given to the first purpose. The Authority also has a duty to seek to foster the economic and social well-being of local communities.
46. LDP2 Policy 8 ‘Special Qualities’ requires the special qualities of the National Park to be conserved and enhanced. The National Park’s Partnership Plan<sup>4</sup>, approved on 26 March 2025 updates the special qualities of the National Park. The special qualities relevant to the application are:
- Landscapes and seascapes of exceptional diversity and quality
  - Rich and varied wildlife
  - Rich heritage and culture
  - Historic patterns of settlement and buildings
  - Historic patterns of land use and traditional boundaries
  - A comprehensive network of Rights of Way
  - The combination of special qualities
  - The sense of community and stewardship
47. The Authority’s adopted Supplementary Planning Guidance (SPG) on ‘Caravan, Camping and Chalet’ development was prepared to support Policy 41 (Caravan, Camping and Chalet Development) of LDP2. Officers consider that significant weight can be attached to this SPG as it provides a systematic assessment of the capacity of landscape character areas to accommodate new caravan, camping and chalet developments.
48. SPG Landscape Character Area (LCA) 1 ‘Saundersfoot Settled Coast’ has a medium sensitivity to small static sites, with no capacity for new sites. The assessment for LCA 1 (page 32) details the characteristics that make the area sensitive to development. The following characteristics are relevant to this application:
- Irregular small fields in places
  - Remaining rural green gaps between settlements
  - The value of the area lies in its National Park status.

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<sup>4</sup> [1-Partnership-Plan.pdf](#)

49. The assessment identifies that “the area has a significant amount of caravan and camping development both on the coastal edge and inland, especially to the southwest.” The summary of capacity states: “The area is at capacity because cumulatively the existing sites are having an adverse effect on the landscape character. The gaps between developments in places, especially southwest, are narrow and are needed to be retained to maintain a sense of a rural character.” There is no capacity for new sites as there are many existing sites which are already cumulatively adversely affecting the landscape character”. The map of LCA 1 (page 34) shows a number of existing static caravan sites in the LCA, with Bonvilles Court Country Park approximately 200 metres to the north of the proposed site and Griffithston Farm, approximately 200 metres to the south of the proposed site.
50. A site visit has been carried out and the proposed site is adjacent to a public right of way (PROW) (SP42/44) and there is boundary vegetation present which may mitigate some landscape impact when viewed from the adjacent PROW during the summer months, the reduced vegetation during winter months would make the site more visible from the PROW and adjacent properties within the Incline Way residential estate, it would be possible to introduce enhanced buffer planting which might reduce localised landscape impact to some extent. The proposed static caravan, and associated buildings/structures are moderate in scale but contrast in colour from the surrounding landscape. It is considered that this proposal if implemented will likely result in an unacceptable adverse effect on the National Park landscape particularly to walkers of the PROW and is therefore contrary to Policy 41. As discussed above it is also considered that the site clearance of vegetation has changed the landscape character of this location.
51. The proposed development will have significant visual impact on the adjacent landscape with the current site clearance opening up the site when viewed from the adjacent access track that forms a Public Right of Way (PROW) and also when viewed from the adjacent neighbouring properties which form part of the Incline Way development. Given the existing topography, level of landscaping and other built structures and soft landscaping the impact on the wider landscape will be more limited.
52. The proposed site is located within LCA 1 which is considered to be at capacity. Table 4 of the SPG provides a definition for no capacity / at capacity and states that the area is unable to accommodate further / any units as it has a high or high/medium sensitivity and / or it has substantial caravan / chalet / camping development which already significantly cumulatively adversely affects character and conflicts with the primary purpose of the National Park.
53. Information from the Authority’s GIS Phase 1 habitat data demonstrates that the site is predominantly categorised as dense scrub which the Tree and Landscape Officer has identified as likely to be a woodland edge feature related to the adjacent protected woodland to the north. CEH Land Cover Map identifies the site area as a Broadleaved woodland – Section 7 priority habitat in Wales. No ecological survey data had been provided at the time of writing the report, but Officers consider that the site clearance which has already taken place as part of the proposal which is retrospective has also altered the character of the landscape in this particular location and has potentially resulted in a loss of biodiversity and habitat. This concern was part of the reason for the Authority issuing a Temporary Stop Notice, Stop Notice and Enforcement Notice on



this site (see above planning history). Whilst the Agent has indicated that the applicant will provide an Ecological Survey this had not been received at the point of report writing. If such a Survey is provided a verbal update on this matter will be given to Committee. Whilst an Ecological survey would allow an assessment of impact to biodiversity and habitats to be undertaken and an assessment of whether mitigation and enhancement can be provided, it would not address the concerns Officers have regarding localised landscape impacts resulting from site clearance or the lack of wider landscape capacity for further caravans in this location.

54. The supporting statement states that the applicant has an established civil engineering business and remains the sole operator with a licence to park his lorry and machinery on a site in Cwmbran. It is unclear what the intention is of running the business if he relocated to Saundersfoot and whether the lorry and machinery would be stored on the site. Paragraph 44 of Circular 005/2018 states that “where Gypsies and Travellers require additional space for work related activities, they should be encouraged to pursue private leasing agreements for nearby space and/or facilities.” The Welsh Government’s guidance: Designing Gypsy and Traveller Sites in Wales provides guidance on how sites should be designed. Relocation of the business does not form part of this application, so speculation as to potential future uses can only be given very limited, if any weight.
55. Officers consider that the development of a traveller site incorporating one static caravan, one touring caravan, day/utility room in an LCA which has no further capacity to accommodate new caravan development would have an unacceptable landscape impact on the National Park particularly to walkers of the PROW. Officers also consider that the site clearance which has already taken place and which is proposed would result in a form of development which fails to harmonise with, or enhance the landform and landscape character of the National Park. The development which has already taken place may also have resulted in harm to biodiversity and habitats but there is insufficient information to assess whether it would be possible to mitigate this and to deliver appropriate site enhancements. The proposal overall is therefore contrary to Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 41 (Caravan, Camping and Chalet Development) of LDP2.

### **2.3. Amenity and Privacy:**

56. Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and 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.Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.

57. SSC indicate that the site is overlooked from Incline Way development to the north and cannot be adequately screened between these sites.
58. Whilst a number of representations have been received which allege impacts on privacy and amenity, Officers consider that there is sufficient distance and screening between the proposed site to allow for a residential development adjacent to existing residential properties without an unacceptable detriment to their privacy or amenity.
59. Noise impacts have been suggested as a potential nuisance due to the applicant's business, but the relocation of the business does not form part of this application, so speculation as to potential future uses can only be given very limited, if any weight. It would also be possible to condition that no business use or storage would be permitted if the application were being recommended for approval and for planning enforcement to take place if this were breached.
60. It is recognised that if the proposal were permitted, some increase in traffic associated with the residential use of what has been countryside location would take place, but this is not to be considered to be at the level that would cause a significant adverse effect.
61. As such, it is only the detriment to local visual amenity which forms a material consideration in relation to amenity, and which would place the proposal in conflict with Policy 30 and the proposal is considered to comply with other elements of this policy.

#### **2.4. Biodiversity, Protected Sites, Green Infrastructure & Landscaping**

62. PPW12, TAN5 and LDP2 Policy 11 (Nationally Protected Sites and Species) requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.
63. To comply with Planning Policy Wales 12 (2024) and the Environment (Wales) Act 2016, planning authorities are expected to ensure every development positively contributes to biodiversity. In addition, PPW12 section 6.4.16 refers to 'All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development'.
64. Saundersfoot Community Council (SSC) has indicated that the clearance work already undertaken on the site has resulted in multiple mature trees being removed and also badger habitat being disturbed. These also raise the fact that no ecological / biodiversity report has been submitted to support the application and inform on the original site condition.
65. SSC also raise concerns on the location of the development with a close proximity to the adjacent stream with potential for pollution risks to the nearby blue flag beaches.
66. Information from the Authority's GIS Phase 1 habitat data demonstrates that the site is predominantly categorised as dense scrub which the Tree and Landscape Officer has identified as likely to be a woodland edge feature related to the adjacent protected

woodland to the north. CEH Land Cover Map identifies the site area as a Broadleaved woodland – Section 7 priority habitat in Wales. Using historical imagery it is clear that the land has been cleared since 2023 after a period of approximately 20 years of growth.

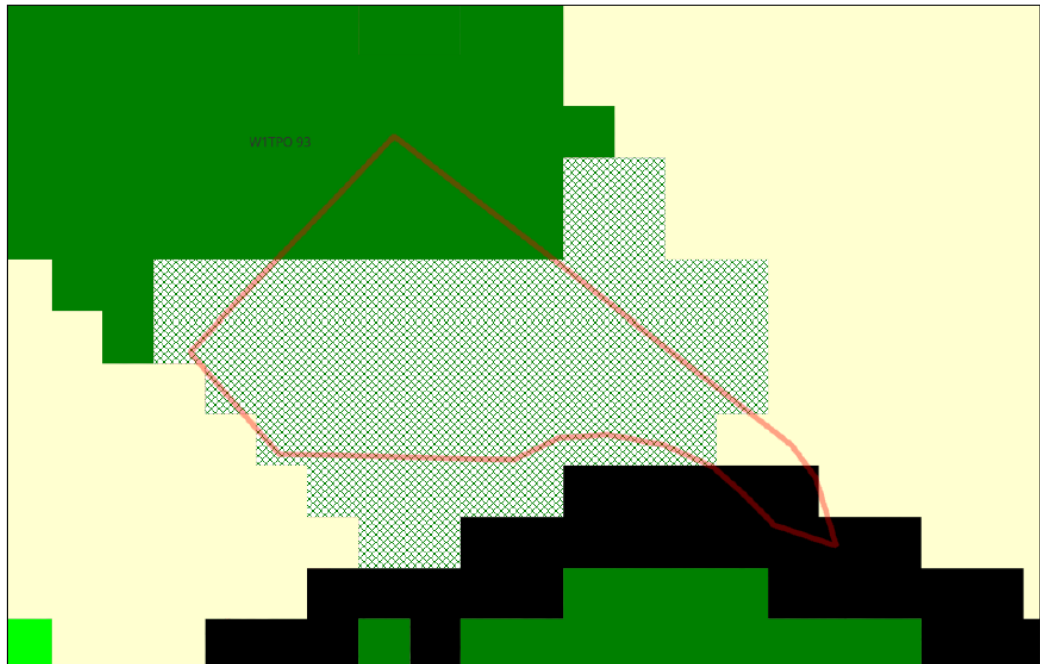
67. The Authority's Ecologist has assessed the application, and the current submitted documents and considers that an ecological report is required to support the application. Even if the site is cleared, an ecological report can use a desk study in combination with what is still present on and adjacent to the site to make an informed decision on what was likely to be present prior to the clearance (this approach is supported in the recent updates to PPW12). The ecological report will also be able to inform any required mitigation and enhancements. The request for this additional information has been forwarded to the agent who has now confirmed via email that an Ecologist has been appointed to provide the additional information (ecological report) in due course.
68. There is a requirement for additional information to be submitted to inform this planning application, this information must be provided prior to the issuing of any planning consent. It will be necessary; to consider ecological issues as part of any planning submission and these should be fully considered in an ecology report in the form of preliminary Ecological Appraisal (PEA) and if necessary, further ecological surveys to be submitted with the application depending on the findings of the preliminary appraisal.
69. The PEA survey which must be carried out by a qualified ecological surveyor will need to cover the following aspects:
- Data from the Local Records Centre
  - Identify any nature conservation features (habitats/species) that are likely to be affected by the proposals and identify potential options for mitigation and enhancement.
  - Phase I habitat survey, to identify the quality and extent of the habitats present. Detailed habitat assessment should only be carried out between the months of April to September only. The habitat survey should also identify the presence of any invasive species. The report should identify the potential of the habitats on site for use by protected species.
  - Reptiles - Common species of reptiles may be present within suitable habitats. These are protected by legislation. The site must be assessed for its potential to support reptiles. Surveys for reptiles must be undertaken if suitable habitat is to be removed. These assessments must inform a code of construction practice for the proposed works with regard to reptiles.
  - Badgers and their setts are protected under The Protection of Badgers Act 1992. Activity within 30 metres of a sett may require a licence. A site may contain badger setts, it is recommended that the site and where possible surrounding land within 30 metres be surveyed for badgers.
  - Birds – the application must make an assessment of the bird populations currently using the application area and the impact of the development on these, in terms of loss of habitat and displacement.
  - Otter - An assessment of any waterbody, watercourse and ditch and their associated vegetation for their potential to support otter must be undertaken and reported in the PEA if works to or surrounding watercourses are proposed. Otter are protected under European and UK legislation. In this case, should otters be present there may be a risk of disturbance from the proposal, partially if there is a natal den nearby. Their presence is a material consideration when a local

planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

- Bats - All British bats are protected under European and UK legislation. Their presence is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat. An assessment of any trees for their potential for bat use should be carried out and reported in a PEA, a full bat survey of any trees assessed to have bat potential should be conducted if these will be impacted upon.
- Any PEA report should also provide appropriate ecological enhancement.
- Lighting must also be considered and kept to a minimum.

70. Without the above information officers consider that no ecological baseline can be established on the site which prevents full consideration of the loss of habitat, appropriate levels of mitigation for the overall loss of habitat and again the ability to provide enhancement in the form of new soft landscaping features. This would form a reason for refusal as the lack of information would not accord with LDP2 Policies 8, 14 and the Environment (Wales) Act 2016.
71. Chapter 6 of Planning Policy Wales 12 states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.
72. PPW also states that a Green Infrastructure Statement (GIS) should be submitted with all planning applications and that the green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach has been applied.
73. A standalone GIS demonstrating how the stepwise approach (Paragraph 6.4.15 of PPW12) has not been provided with this application which is now a planning requirement. The stepwise approach is referred to; however, there has been no information provided as to the baseline data of the site prior to the clearance carried out in 2022 to prepare the site for the proposed development.
74. The arboricultural review (ARW 1711) refers to possible mitigation planting on site and drawing reference: 04d also includes proposed planting on site; which is acceptable in principle; however, there is no clarification or justification that proposed planting will mitigate and enhance the site based on previous losses.
75. By referring to GIS Phase I habitat data (see Phase 1 habitat data image below), the site is predominantly categorised as dense scrub, likely to be a woodland edge feature related to the adjacent protected woodland to the north which is protected under TPO93 (see TPO93 image below)
76. Phase 1 habitat data image

*Phase I data*  
Hatched area - Dense scrub  
Solid green area – Woodland  
Solid black – road



77. Tree Preservation Order image (orange shaded area)



78. As noted above an email has been received by the agent confirming that an ecological survey is planned for the site and will likely assist in providing the baseline data in which to provide a landscape management plan for ensuring a net benefit for biodiversity upon completion of any development subsequently approved. This has not though, been provided (a month later) at the point of this report being written. Any verbal updates will be provided to Committee with the presentation. As set out above, whilst an Ecological survey and report would allow assessment as to whether appropriate mitigation and enhancements could be delivered with this proposal, it would not address the concerns the Authority has about the local landscape impact of

site clearance necessary to deliver the proposal and the wider lack of landscape capacity in this location.

79. Annex 3 of the Tree and Landscape Officers' consultation response details further information that the agent should address when providing an appropriate GIS.
80. At the time of writing this report the submitted GIS does not follow a stepwise approach, and the lack of a PEA report is considered to result in an overall lack of information relating to an ecological baseline for the site, which in turn prevents full consideration on appropriate biodiversity mitigation and enhancement features as required by LDP2 Policies 8, 14, PPW12 – 6.4.16 and the Environment (Wales) Act 2016. It is also clear that there has been substantial clearing of the site which has potentially caused the loss of species or habitats. Should further information be provided on these points these will be reported to Committee, however at present this lack of information alongside the local landscape impacts and wider lack of landscape capacity forms reasons for refusal.

## **2.5. Access and Parking**

81. Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that assist in delivering improved traffic and parking management.
82. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved
83. SSC has raised concerns on the access which is via a minor road / bridleway, and they consider it insufficient for safe vehicle access.
84. The Authority's Access and Rights of Way team have indicated that the access to the proposed site will be via a registered public right of way (Bridleway SP42/44) which is known as Moreton Lane. The public have a right of passage on foot, pedal bicycle and horseback along this route. It is considered that the proposed number of additional vehicular movements that can be expected to be generated by the proposed development is not significant and that the section of the bridleway to be used as a private access will be relatively short in length (approx. 60 metres). This stretch of the bridleway is considered to have sufficient width, verges and good sight lines to enable public and private traffic to safely coexist.
85. Therefore, Officers have no objection in respect of the proposed development and the adjacent public right of way, subject to an informative note to be added to any consent granted to cover criteria which the developers will need to be aware of during the construction phase of the proposed development.
86. Pembrokeshire County Council Highways officers have been consulted. The proposed expanded site plan (DWG No. 03c) illustrates the access to the site will be located approximately 30 metres west of the private entrance track off the adjacent Public Right of Way (PROW), which provides access to two private dwellings and a Water Treatment Site. Officers consider there are good verge widths on both sides of the access, allowing for acceptable sight lines.

87. It is considered that as part of the proposed development no site boundary fences must be placed within 2metres of the PROW near the site access to maintain good visibility onto the PROW for egressing vehicles. The proposed site plan (DWG No. 04d) and Design and Access (DAS) states that the site access has been improved and laid with rolled permeable stone, this must be laid for a minimum of 10 metres. In addition, any gates should be set back a minimum of 10 metres behind the edge of the PROW to allow all vehicles including those towing would be able to pull off the road while opening the gates in order to not cause an obstruction on the Public Right of Way. The parking provision and turning area for the site is acceptable, allowing for vehicles to leave in a forward gear.
88. Officers are aware that a small section of the access road on Moreton Lane is subject to flood risk from rivers (Zone 3). This matter has been raised with Pembrokeshire County Council Highway officers. They have advised that alternative access is available which avoids this route; however, the alternative access is narrow, and should this be relied on there would need to be an assessment as to whether emergency vehicles could use it which would require a swept path analysis. This could be conditioned if necessary, as a Grampian condition, so this additional information is not considered sufficient to form a reason for refusal.
89. Pembrokeshire County Council Highways officers have not objected to the application subject to planning conditions being imposed to control location of access gates, bound surface for access track and appropriate parking and turning within the site. They also request an informative note be added to any consent granted for contact to be made on naming and numbering of all roads and new developments to facilitate in the provision of service connections. In response to clarifications sought regarding flood risk elements of the road, Highways Officers have indicated that a swept path analysis should be undertaken, this could be addressed via a Grampian condition.
90. Overall, Officers consider that in relation to the access and parking the current proposal can be supported subject to the above conditions and would accord in terms of Policies 59 and 60 of LDP2. This is not considered however, to outweigh the other concerns with this application.

## **2.6. Foul and Surface Water Drainage**

91. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of water and drainage. Policy 32 (Surface Water Drainage) of LDP2 requires that development will be required to incorporate sustainable drainage systems for the disposal of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.
92. SSC express concerns on sewage system capacity for this development.
93. Dwr Cymru / Welsh Water (DC/WW) confirm that the proposed site is located within the catchment of a public sewerage system which drains to Saundersfoot Wastewater Treatment Works (WwTW). They have considered the impact of the foul flows to be generated by the proposed development and consider that these flows can be accommodated within the public sewerage system. In addition, they request an informative note be added to any consent granted to deal with connection to the public sewer.



94. DC/WW recognise the application details that the surface water will be disposed of via a soakaway within the site area, this method of disposal is considered to be a suitable method for surface water discharge and will be subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the '*Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems*'.
95. DC/WW does not raise objection to the proposed method of surface water disposal in principle and refers to separate consultation and agreement with PCC Drainage Engineers but does request that a condition be imposed to ensure that no surface water or land drainage shall be allowed to connect directly or indirectly with the public sewerage network.
96. The drainage engineers indicate that given the sites location and proximity to ordinary watercourses a condition is required to agree percolation testing prior to the commencement of development and to ensure that the proposed soakaway drainage method for surface water can be implemented within the site. If the testing result in determine that a soakaway cannot be used to discharged for surface water an alternative drainage strategy will need to be submitted and approved by the Local Planning Authority and then implemented as agreed and thereafter maintained.
97. The drainage engineers at Pembrokeshire County Council have also confirmed that the development will not require SAB approval, given this position if the Authority were minded to approve it would seek to introduce a condition ensuring appropriate disposal of surface water was achieved.
98. The development is therefore considered to be acceptable in terms of Policies 29 and 32 of LDP2, TAN 15 and Schedule 3 of the Flood and Water Management Act 2010. Whilst matters of drainage could be satisfactorily addressed via condition, the is not considered to outweigh the other concerns with this application proposal.

## **2.7. Impact on Scheduled Ancient Monuments**

99. Cadw have been consulted as a statutory consultee due to the presence of a Scheduled Ancient Monument (SAM) within 500 metres of the development site. Cadw's lack of response is usually an indication that they have no comment to make.
100. The nearest SAM is The Tramroad Incline to the north/north-east of the site which is separated from the proposal by existing residential development. In this context, Officers consider that the proposal is unlikely to result in harm to the setting of the Scheduled Ancient Monument; however, this is not considered to outweigh the other concerns with this application proposal.

## **3. Other Matters**

101. As set out within the policy section above the Authority must consider its duties under both the Equality Act 2010 and the Human Rights Act 1998 in coming to a decision. Specifically, the Officer consider that the applicant's status as a Gypsy Traveller is a protected characteristic, and Officers have therefore considered relevant guidance in the form of the Circular from Welsh Government and the relevant policy of the Local Development Plan 2.

102. In relation to the Human Rights Act 1998, Officers have considered Article 8 (Right to respect for private and family life, home and correspondence), Article 14 (Prohibition of discrimination) and Article 1 of Protocol 1 (Right to peaceful enjoyment of possessions and protection of property).
103. As set out above, the Authority recognises that the applicant currently benefits from a home and that refusal of this application would not result in the applicant becoming homeless. Officers in coming to a recommendation have weighed up the rights of the individual against the wider public interest in determining whether development should be allowed to proceed. In this case the issues of local landscape harm, wider lack of landscape capacity and potential harm to habitats are considered to outweigh other considerations and have resulted in a recommendation for refusal and are of the view that this would be a proportionate outcome, taking into account the human rights implications for the applicants.

#### **4. Conclusion**

104. The proposed development is considered to result in unacceptable landscape impacts to the National Park and to potentially disturb species and habitats within the countryside. The site is therefore not considered suitable for the development, contrary to the provisions of criterion d and f of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2.
105. The proposal would not be compatible with the National Park Purpose of conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and would not protect the Special Qualities of the National Park or its landscape. As such the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) and Policy 30 (Amenity).
106. The proposal would introduce caravan development in an area of the National Park without landscape capacity, resulting in unacceptable cumulative impacts contrary to Policy 41 Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance. Impacts on residential amenity and matters of access, drainage and historic assets are acceptable or could be addressed appropriately via planning conditions, however these matters do not outweigh the harm identified above.
107. The proposal is therefore recommended for refusal.
108. 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.

#### **5. Recommendation**

**REFUSE**, subject to the following reasons:

1. The proposed development is considered to result in unacceptable landscape impacts to the National Park resulting in a development which fails to harmonise with, or enhance the landform and landscape character of the National Park. There is also a lack of information on whether the proposal will unacceptably disturb species and

habitats within the countryside. The site is therefore not considered suitable for the development, contrary to the provisions of criterion d) and f) of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2. The proposal would not be compatible with the National Park Purpose of conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and would not protect the Special Qualities of the National Park or its landscape. As such the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) and Policy 30 (Amenity).

2. The proposal would introduce caravan development in an area of the National Park without landscape capacity, resulting in unacceptable cumulative impacts contrary to Policy 41 Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance.