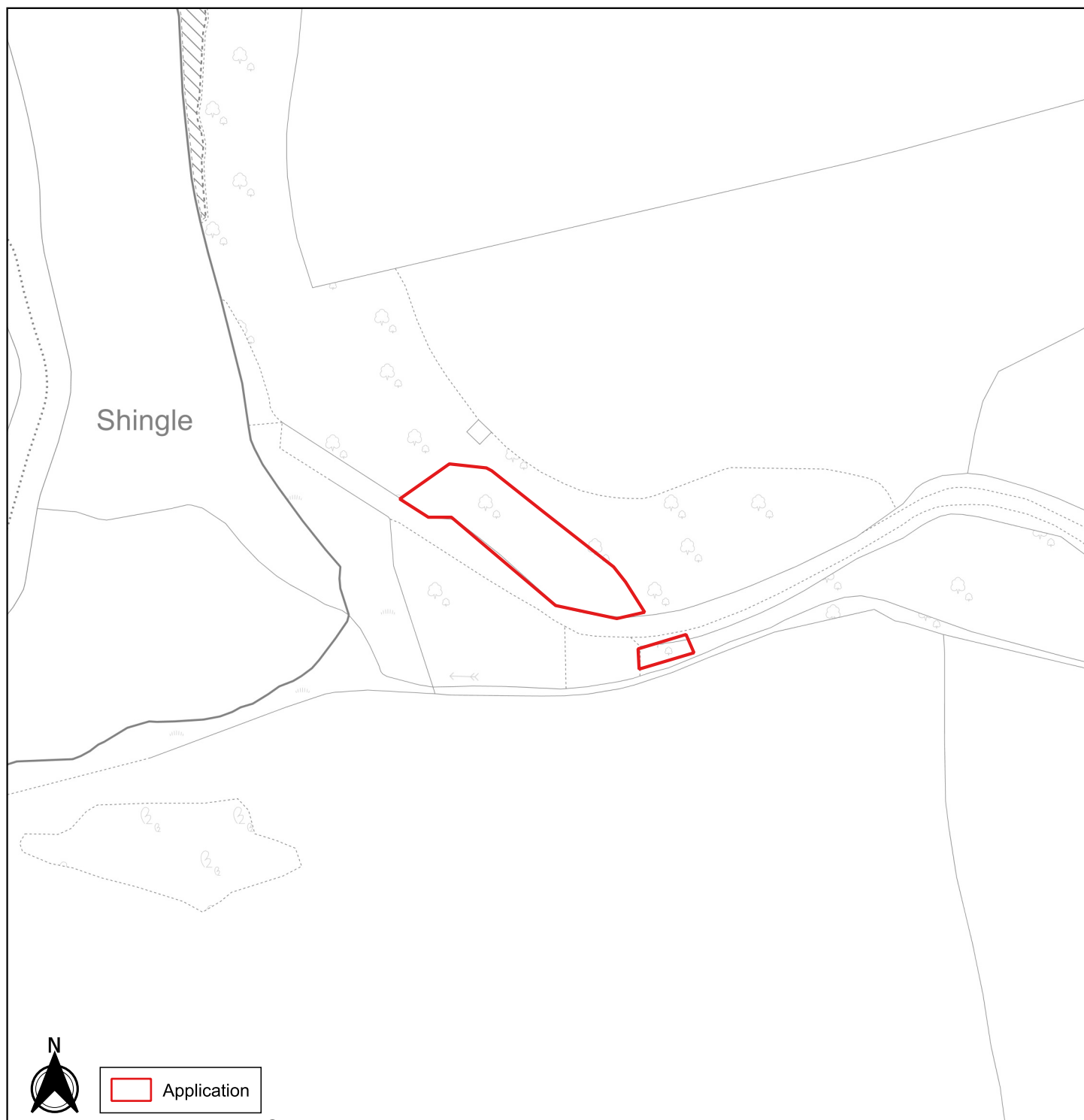
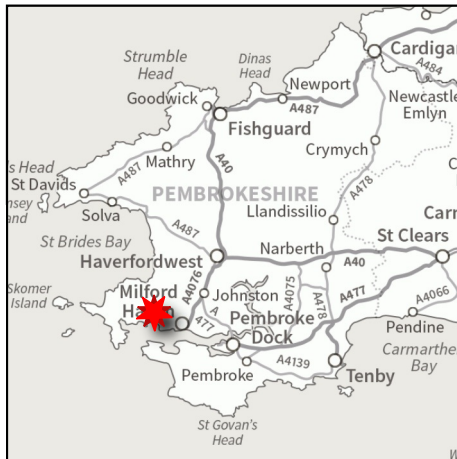




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



Ref No: NP/25/0106/FUL

Proposal: Re-submission of NP/23/0636/FUL - change of use of land for creation of mobile lodge/caravan under policy 41 with provision of dedicated community car park/turning area, passing bays, together with ecological & landscape enhancements

Site Location: Land adjacent Old Kilns / Cottage, Middle Kilns road, Herbrandston, Pembrokeshire, SA73 3TE

Recommendation: Refuse

The application is being brought to the Development Management Committee at the request of a Member of Committee.

Summary:

This application is a resubmission of previously refused application NP/23/0636/FUL which sought permission for the change of use of land for creation of mobile lodge / caravan, provision of dedicated community parking / turning area, together with ecological and landscape enhancements.

This current application differs from the previous application only by the submission of a green infrastructure statement, and a drawing showing the location of potential passing places along Middle Kiln Road. There have been no policy changes since the refusal of the previous application.

The site is located in a highly sensitive area, being within close proximity to both a Site of Special Scientific Interest (SSSI) (Milford Haven Waterway) and Special Area of Conservation (Pembrokeshire Marine SAC). It is also located within the countryside; therefore Policy 7 (Countryside) of LDP2 is relevant. This Policy stipulates the types of development / uses that are deemed acceptable and appropriate within the countryside. It is considered that the proposed siting of a mobile lodge / caravan is contrary to the provisions of Policy 7. As such, the proposal fails to comply with the provisions of Policy 41 (Caravan, Camping and Chalet Development) of LDP2.

Given the unsustainable location of the development, coupled with the lack of sustainable travel opportunities, the proposal is also contrary to Policies 59 (Sustainable Transport) and 60 (Impacts of Traffic) of LDP2.

A habitats regulations assessment (HRA) has been carried out, with the outcome being that the development has the potential to have a significant effect upon the Greater Horseshoe Bat, which are a mobile feature of the designated Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC) arising from disturbance to the foraging and commuting corridor due to the extent of glazing proposed.

Overall, whilst the proposal seeks to improve the parking facilities on Middle Kiln Road, the proposal remains unacceptable due to the harm that would be caused as a result. The recommendation is to refuse permission.

The full details of the application and consultation responses can be viewed on-line here: [Citizen Portal Planning - application details](#)

Consultee Response

- Community Council – Object
- Buildings Conservation Officer – No adverse comments
- Planning Ecologist - Development cannot proceed
- Drainage Engineer - SAB approval required
- Highways Authority - Recommend Refusal
- Natural Resources Wales – Development cannot proceed
- Heneb – The Trust for Welsh Archaeology – No comments received
- Cadw – No comments received
- Tree and Landscape officer – Conditional consent

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.

Four representations have been received with the objections summarised below:

- Dismay at destruction of trees and natural vegetation;
- Holiday development would encroach on the peace and safety that wildlife find here;
- Concern at land being used as a tip or play area;
- Concern at lack of infrastructure (water, electricity, sewage);
- The area is a special area of conservation;
- Nothing has fundamentally changed since the refusal of the original application
- Proposal does not fall within the curtilage of any established and agreed local development plan for the community of Herbrandston;
- Proposal is in complete non-compliance with many of the Parks fundamental policies and objectives regarding the conservation of the park and its natural assets
- We must protect these few and diminishing areas of national importance throughout the British Isles

Herbrandston Community Council's objection states that they objected previously to the proposal and their objections remain to this application. They state that they believe Sandy Haven estuary classified as a Special Area of Conservation should be protected and that allowing the change of use for this land would be detrimental and devastating to the shoreline and protected species. They consider that site clearance took place prior to ecological surveys being undertaken. They do not consider development in a SSSI location is appropriate and would raise worrying matters of precedent.

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).

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:

- TAN 5 – Nature Conservation and Planning
- TAN 10 – Tree Preservation Orders
- TAN 15 – Development and Flood Risk
- 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 38 (Visitor Economy)
- Policy 41 (Caravan, Camping and Chalet Development)
- Policy 48 (Affordable Housing)
- 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:

- SPG – Biodiversity
- SPG – Caravan and Camping
- SPG – Sustainable Design & Development
- SPG – Landscape Character

Constraints

- Special Area of Conservation – within 500m
- Site of Special Scientific Interest – within 50m
- Tree Preservation Order
- Historic Landscape
- Ancient Monument – within 500m
- Regionally Important Geological Sites
- Potential for Surface Water Flooding

- Recreation Character Areas
- Affordable Housing Submarkets
- Seascape Character Areas
- Within Site of Special Scientific Interest
- Landscape Character Area
- Special Area of Conservation – within 50m

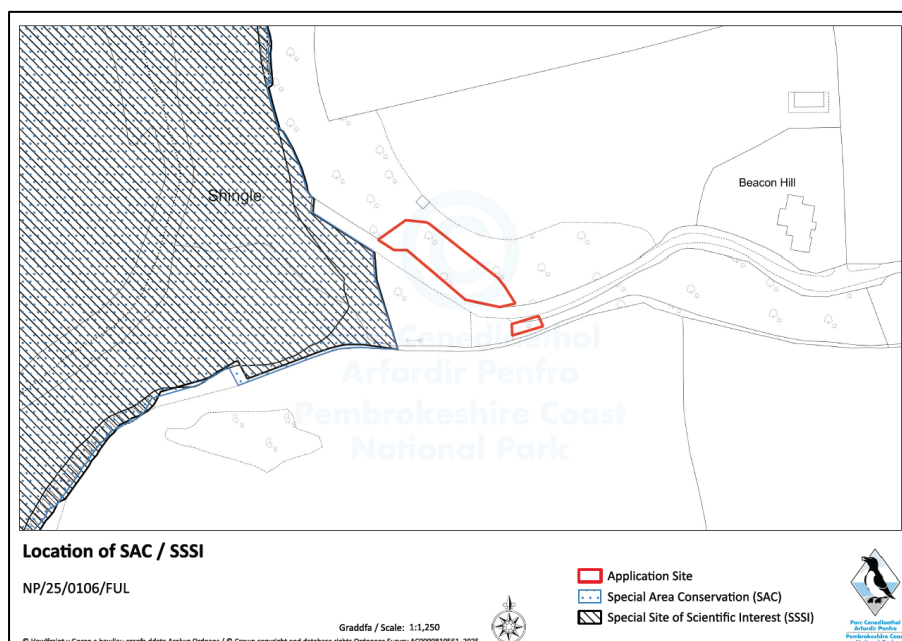
Relevant Planning History

- NP/23/0636/FUL – Change of use of land for creation of mobile lodge / caravan under Policy 41 (meeting the definition of a caravan under the Caravan Act) with provision of dedicated community car park / turning area together with ecological and landscape enhancements – Refused
- NP/21/0591/TPO – Works to trees at TPO133 – Part Granted, Part Refused

1. Officer's Appraisal

Site and Proposed development

- The site is located at the western end of Middle Kiln Road, approximately 38 metres from where the road accesses the coast at Sandy Haven. It is located outside of any Centre Boundary as defined by LDP2 and is therefore considered countryside. The site is approximately 1 km to the west of Herbrandston itself. It comprises of rough ground and scrub. The location of the proposed community car parking area is to the south-east of the lodge's proposed location. This location is currently used as an informal parking. Some site clearance has already taken place, with clearance beginning prior to the submission of the previous application. Within the area of woodland to the south of the minor road lie the remains of an old lime kiln. These remains are Grade II listed. There are also remains of a former cottage. The topography of the site is such that the levels to the northern side of the road of higher than those on the southern side of the road. The immediate surroundings comprise of woodlands and scrubland, which is subject to a Tree Preservation Order. The plan below shows the application site in the context of the SAC and SSSI.



Current Proposal

2. The proposal comprises:
 - Creation of mobile lodge / caravan
 - Creation of dedicated community car parking / turning areas and passing bays
 - Ecological enhancements

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. Surface Water Drainage
- 2.7. Green Infrastructure
- 2.8. Visitor Economy, Impact upon Countryside and Landscape Character

2.1. Policy and Principle of Development:

3. 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).
4. 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.
5. 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...’.
6. 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.
7. 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.
8. Paragraph 3.60 of Planning Policy Wales Edition 12 (2024) states: ‘*Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access, habitat and landscape*’

conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area'

9. Policy 1 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP) sets out the National Park's purposes and duty, in order to ensure that development within the Park is compatible with these.
10. The site is not located within any Centre, or Rural Centre, and as such, is deemed to be within the countryside. Policy 7 (Countryside) of LDP2 sets out the type of development which would be considered acceptable within the countryside. The siting of a mobile lodge / caravan is not listed within the acceptable development. Tourism development or recreational activity can be acceptable, but only where a need for a countryside location is justified. The isolated nature of the proposal for a single caravan is not considered to fall within this category. This point is reiterated within Policy 38 (Visitor Economy). Therefore, there is an in-principle objection to this development. The improvement to the informal parking area would not out-weigh this objection.
11. Policy 41 (Caravan, Camping and Chalet Development) of LDP2 relates to caravan, camping and chalet development and allows for new sites to be considered in locations away from the coast and Preseli Hills and locations inter-visible with them. Sites are required to avoid sensitive locations and units should be sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect on the National park's landscape. The mobile lodge / caravan proposed as part of this application would be located in a highly sensitive location and would be close to the coast. As such, the proposal fails to accord with Policy 41.
12. The proposal is deemed to be contrary to the provision of Policy 41 as the mobile lodge / caravan would be sited close to the coast and would not avoid a sensitive area. The proposed use of a single mobile caravan is not considered justified within a countryside location.
13. Overall, the proposed development is incompatible with Strategic Policy requirements and therefore, the principle of development in this instance, is not considered acceptable and the proposal cannot be supported.

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

14. 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.
15. 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.

16. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
17. The site lies within the countryside and is within approximately 5m of a Site of Special Scientific Interest (SSSI) – Milford Haven Waterway. It is also located within approximately 5m of a Marine Special Area of Conservation (Pembrokeshire Marine SAC). It is therefore a highly sensitive site.
18. Directly to the south-west of the mobile lodge / caravan's proposed location lies a Grade II listed limekiln. Historically, limekilns were generally located near creeks or pills to allow the import of coal and limestone via the river, for burning to be used as agricultural lime for making lime mortar. Ordnance surveys confirm that the kiln here was an isolated structure until the early 20th Century, when a house was built immediately south of the kiln. This house now only survives as footings. It is considered that the scale and design of the proposed lodge would allow for the historical setting of the kiln and its relationship to the tidal pill to remain pre-eminent. In terms of the setting of the listed building and the requirements of the Historic Environment (Wales) Act 2023, Technical Advice Note (TAN) 24 – The Historic Environment, and Conservation Principles for the Sustainable Management of the Historic Environment of Wales (Cadw, 2011), the proposal does not raise concerns.
19. Notwithstanding the impact upon the listed lime kiln, it is considered that the siting of a mobile lodge / caravan and the associated development, in this location would result in significant harm in terms of visual intrusion upon this currently un-developed site, and would in turn, cause harm to the special qualities of the National Park.
20. The planning statement submitted with the application acknowledges that the mobile lodge/ caravan would be visible from certain viewpoints due to the elevation of the land. This would further exacerbate the visual intrusion of the development. The proposal therefore fails to harmonise with or enhance the landform in this location.
21. The site lies within Landscape Character Area No 11 (Herbrandston). The special qualities of this area are listed within the Authority's Landscape Supplementary Planning Guidance (SPG). One of the qualities of this area is its low visual values, and it is noted within the SPG that the views to the west are not subject to the oil refinery, which is another special quality of this area. The development of this elevated piece of land would serve to disrupt the view to the west, from the site of the proposed mobile lodge / caravan and associated access across Sandy Haven Pill, thus causing harm to this quiet, estuarine area.
22. Overall, the development would have an unacceptable impact upon the special character and special qualities of this highly sensitive area of the National Park. As such, the development is contrary to policies 8, 14 and 29 of LDP2 and cannot be supported.

2.3. Amenity and Privacy:

23. 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.
24. The nearest residential property is located approximately 120m to the east, and as such, there are no over-riding concerns in relation to the proposal's impact upon residential amenity.
25. However, it is considered that the proposal would have a detrimental impact on the quality of the environment in this particular location, would lead to an increase in traffic which would have an adverse impact due to the unsustainable location of the site, and, as noted in Section 2.2 above, would be visually intrusive within this sensitive part of the Park's landscape.
26. Overall, the development is considered to have an unacceptable impact upon the amenity of this area and is contrary to Policy 30 of the Authority's LDP2.

2.4. Biodiversity, Protected Sites, Green Infrastructure & Landscaping

27. 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.
28. 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.
29. 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.
30. It also states that a green infrastructure statement 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.

31. A standalone green infrastructure statement has been received with the application and Table 1 shows how the proposal has been considered against the step-wise approach. However, there is potential for greater enhancement of the site and the associated land holdings if permission were to be granted.
32. The Authority's Tree and Landscape Officer has been consulted on this application and notes that whilst, overall, the proposed landscaping appears to meet the 3:1 compensatory planting requirement identified in paragraph 6.4.42 of PPW12, there is potential to provide a more site-specific landscape management scheme, and for species which would provide more potential in terms of connectivity, resilience variety and biodiversity into the scheme. It is noted that these details could be requested prior to the determination of the application.
33. However, Paragraph 6.4.16 of PPW12 states that '*potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit must be achieved from that point*'. Since some site clearance took place prior to the submission of any application, and indeed, prior to the Preliminary Ecological Assessment being undertaken, the Authority has no certainty in relation to details of the baseline green infrastructure of this site, and as a result, cannot be confident that the proposed planting / biodiversity enhancements would in fact, result in a net benefit for biodiversity. As such, the proposal is not considered to be in accordance with PPW 12.
34. The site is in close proximity to a Site of Special Scientific Interest. SSSIs are of national importance. The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000, places a duty on all public bodies, including planning authorities, to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features by reason of which a SSSI is of special interest. SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. In this case – the proposal is in close proximity to the SSSI. NRW have not raised any concerns regarding specific impact on the SSSI, however it is recognised that the potential pathway for impact on water quality which applies to the SAC would also apply to the SSSI here.
35. The site is also in very close proximity to the Pembrokeshire Marine Special Area of Conservation (SAC), and although Greater Horseshoe bats are not a feature of the Pembrokeshire Marine SAC, they are a feature of the Milford Haven Waterway SSSI, and, the site is located within 2.5km of South Hook Fort; with South Hook Fort being one of the most important hibernation sites for Greater Horseshoe Bats from the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC).
36. As the application site is within 2.5km of South Hook Fort, this area is used for foraging and commuting by the Greater Horseshoe bats. The bats require dark, sheltered flyways with trees, hedges and species rich habitats to feed over close to the hibernation site.

37. A test of likely significant effects (TLSE) has therefore been carried out in accordance with the Conservation of Habitats and Species 2017 Regulations.
38. In this instance, the TLSE concludes that there would be a likely significant effect upon the Greater Horseshoe bats, which are a mobile feature of the Pembrokeshire Bat Sites and Bosherton Lakes SAC and use the area around the application site for foraging and commuting. Therefore, the Appropriate Assessment (AA) process was triggered.
39. It is noted that the population at risk from the proposed development is the Greater Horseshoe Bat, and that these risks include loss of roosts, loss of habitat, loss of connectivity to foraging and roost sites. These risks are not deemed to be significant in this case. However, it is considered that disturbance from light pollution altering commuting and foraging routes could be a significant impact of this development.
40. The conclusion of the Appropriate Assessment is that in the absence of mitigation measures, the extent of glazing proposed on the north-west elevation could have a significant impact on the dark corridor used by the Greater Horseshoe bats, which are a mobile feature of the Pembrokeshire Bat Sites and Bosherton Lakes SAC, for commuting and foraging, and as such, the development cannot proceed.
41. The Authority has sent its findings to NRW, and NRW have agreed with the Authority's conclusion.

2.5. Access and Parking

42. 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.
43. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved and states that development will not be permitted where:
 - a) appropriate access cannot be achieved; or
 - b) traffic is likely to generate an unacceptable adverse effect on congested areas or at times of peak traffic flows; or
 - c) traffic is likely to be generated at inappropriate times such as late at night in residential areas; or
 - d) where there is an unacceptable adverse effect on road safety; or
 - e) where significant environmental damage would be caused and cannot be mitigated; or
 - f) the proposal would undermine the vitality and viability of a Centre.
44. The site is located at the end of a narrow, unclassified highway. The road is 29m at its narrowest point and has one formal passing place along its stretch from the junction with the C30001 highway, with some informal bays located at fields / residential accesses.

45. Whilst the submitted design and access statement identifies six potential passing bays along the stretch of highway from the application to the junction with the C3001, there

are long stretches of over 200 metres of narrow highway with no verge, along the length of the road. The applicant has not considered mitigation measures to account for the increase in traffic associated with the proposed development along Middle Kilns Road. This could be in the form of additional formalised passing bays to allow vehicles to easily pass each other and pedestrians to take refuge, which would reduce the risk of potential conflict between pedestrians and vehicles, and / or oncoming vehicles. In addition, the proposed bays appear to be within informal locations on land owned by third-parties and no evidence has been provided that the future development of these can be agreed. The locations of the prospective bays are in areas where there are existing farm access points, and / or private property. With the exception of Passing Opportunity 3 (as shown on Drawing 01B) and the parking facilities near the site, none of the other proposals would be immediately acceptable without further evidence. It should be noted that the proposed passing places identified are not within the application's red line development boundary, and as such, it is considered by this Authority that they are not formally part of this proposal.

46. Notwithstanding the acceptability or otherwise of the potential passing places, the site is not within, or located within a reasonable distance of local amenities, including public transport. The nearest bus stop is located approximately 1.5km away in Herbrandston, with the 300 service stopping three times daily, with the nearest service town – Milford Haven, being located approximately 5KM from the site. Whilst there is a shared use path between Herbrandston and Milford Haven, adjacent the C3001 highway, sustainable and active travel opportunities are low, and as such, this encourages the use of private vehicles to access the site.
47. The site is not within, or well related to an appropriate settlement, does not involve the conversion of an existing dwelling, a historic building, nor a traditional building, and it does not relate to an enterprise for which a countryside location is essential. Due to the unsustainable location of the proposal, it is deemed that the works would have a negative environmental impact through additional traffic movements. As such, the proposal is considered contrary to Policies 59 and 60 of LDP2.

2.6. Surface Water Drainage:

48. 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.
49. The Drainage Engineer has been consulted on this application and notes that SAB approval will be required.

2.7. Visitor Economy

50. As previously noted in section 2.1 above, the application site is located within the countryside. Policy 7 (Countryside) of LDP2 sets out the developments / uses that would be deemed acceptable in such a location. Criterion d) states that a rural enterprise or tourist attraction or recreational activity would be considered acceptable where the need to locate in the countryside is essential. The siting of a mobile lodge / caravan does not fall within those forms of development that are deemed acceptable.

51. Policy 38 LDP2 is the strategy policy for the Visitor Economy of the National Park, and under criterion a) allows for limited caravan, camping and chalet development. Policy 41 relates to caravan, camping and chalet and allows for new sites to be considered in locations away from the coast and Preseli Hills, and locations inter-visible between them. Sites are required to avoid sensitive locations and units should be sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect on the National Park landscape. There should be no unacceptable cumulative effects, and where possible any ancillary facilities should be located in existing buildings.
52. The proposed site is located less than 40 metres from the coast and the proposal is therefore contrary to Policy 41 of LDP2.
53. The Authority's SPG on camping and caravan development provides more detail on the types of development that may be permitted in the identified landscape character areas of the National Park. As defined in the guidance, each of the sites would be categorised as a small static site in terms of its size and the type of accommodation proposed. The general siting and mitigation guidance set out in section 6 of the SPG lists coastal edge and Registered Historic Landscapes as places to avoid when considering new units.
54. The proposed site is located within Landscape Character Area No.11 – Herbrandston Refinery Fringe. The SPG for this area identifies a high/ medium sensitivity for small static sites with limited capacity for new development due to the intimate estuarial landscape of Sandy Haven, open slopes and skylines and the registered historic landscape. In particular the guidance lists the slopes down to Sandy Haven in the western part of the area as areas that make the location sensitive to development.
55. The proposed site for the mobile lodge / caravan is on a section of elevated land and the planning statement acknowledges this, and that the development would be visible from certain directions in this location due to this elevation. In addition, the north-western elevation is comprised of extensive glazing. This elevation would face the coast and has the potential for significant impacts on amenity and have the potential for light pollution.
56. Whilst the application proposes to improve the informal parking arrangements that existing to the south-east of the site of the proposed lodge, this does not out-weigh the in-principle policy objection to locating the mobile lodge / caravan in this location. As such, the proposal is deemed contrary to Policies 7, 38 and 41 of LDP2.

3. Conclusion

57. In consideration of all points raised above, it is deemed that the proposal scheme fails to accord with both the PCNPA adopted Local Development Plan 2 and National Planning Policy in the following respects:
 - The proposed siting of a mobile lodge / caravan and associated development would be unacceptable in principle as a countryside location is not justified as required by Policy 7 of LDP2;
 - The proposal is contrary to the provisions of Policy 41 of LDP2 as it would result in development near the and inter-visible with the coast;

- The proposal would cause harm to the special qualities of this highly sensitive area within the National Park by virtue of its siting, and would be contrary to Policies 8, 14 and 29 of LDP2;
- The proposal would result in an increase in traffic within an unsustainable location and would therefore be contrary to Policies 59 and 60 of LDP2.
- The proposal would have significant adverse effects the integrity of a mobile feature of a Nationally Protected Site (Pembrokeshire Bat Sites and Bosherton Lakes SAC) and is therefore contrary to the provisions of Policy 11 of LDP2 and to Regulation 63 of the Habitat Regulations
- Due to the site clearance which has already taken place, uncertainty exists as to the baseline level of the site's green infrastructure, it therefore follows that there is uncertainty as to whether the proposed enhancements result in a net benefit for biodiversity, contrary to paragraph 6.4.16 of Planning Policy Wales 12.

58. 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.

4. Recommendation

REFUSE, for the following reasons:

1. The proposal would be contrary to Policy 7 (Countryside) of the Pembrokeshire Coast National Park Local Development Plan (adopted 2020) as it would result in unacceptable development within the countryside, also contrary to the principles of Planning Policy Wales Edition 12 (2024) (paragraph 3.60).
2. The proposed mobile lodge / caravan and associated development would be contrary to Policy 41 (Caravan, Camping and Chalet development) of the Pembrokeshire Coast National Park Local Development Plan (adopted 2020) and the adopted Caravan and Camping Supplementary Planning Guidance as it would result in development at the coast. This development would result in unacceptable visual intrusion in this location, harming the special qualities of the National Park, contrary to the requirements of Policy 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park and 29 (Sustainable Design) of the Pembrokeshire Coast National Park Local Development Plan (adopted 2020).
3. The proposal would result in negative environmental impacts through increased traffic movements to and from the site, which is deemed to be unsustainable, contrary to Policy 59 (Sustainable Transport) of the Pembrokeshire Coast National Park Local Development plan (adopted 2020) and paragraphs 4.0.3 and 4.1.51 of Planning Policy Wales Edition 12 (2024).
4. The proposal would result in a significant effect on the foraging and commuting corridors of a species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations (2010). The proposal would have significant adverse effects on the integrity of a mobile feature of a Nationally Protected Site (Pembrokeshire Bat Sites and Bosherton Lakes SAC) and Pembrokeshire Coast National Park Authority

is therefore contrary to the provisions of Policy 11 of the Pembrokeshire Coast National Park Local Development Plan 2 (adopted 2020) and to Regulation 63 of the Habitat Regulations.

5. There is uncertainty in relation to the baseline Green Infrastructure on the site due to the site clearance which has already taken place. There is therefore uncertainty as to the proposal's compliance with paragraph 6.4.5 of Planning Policy Wales Edition 12 (2024).