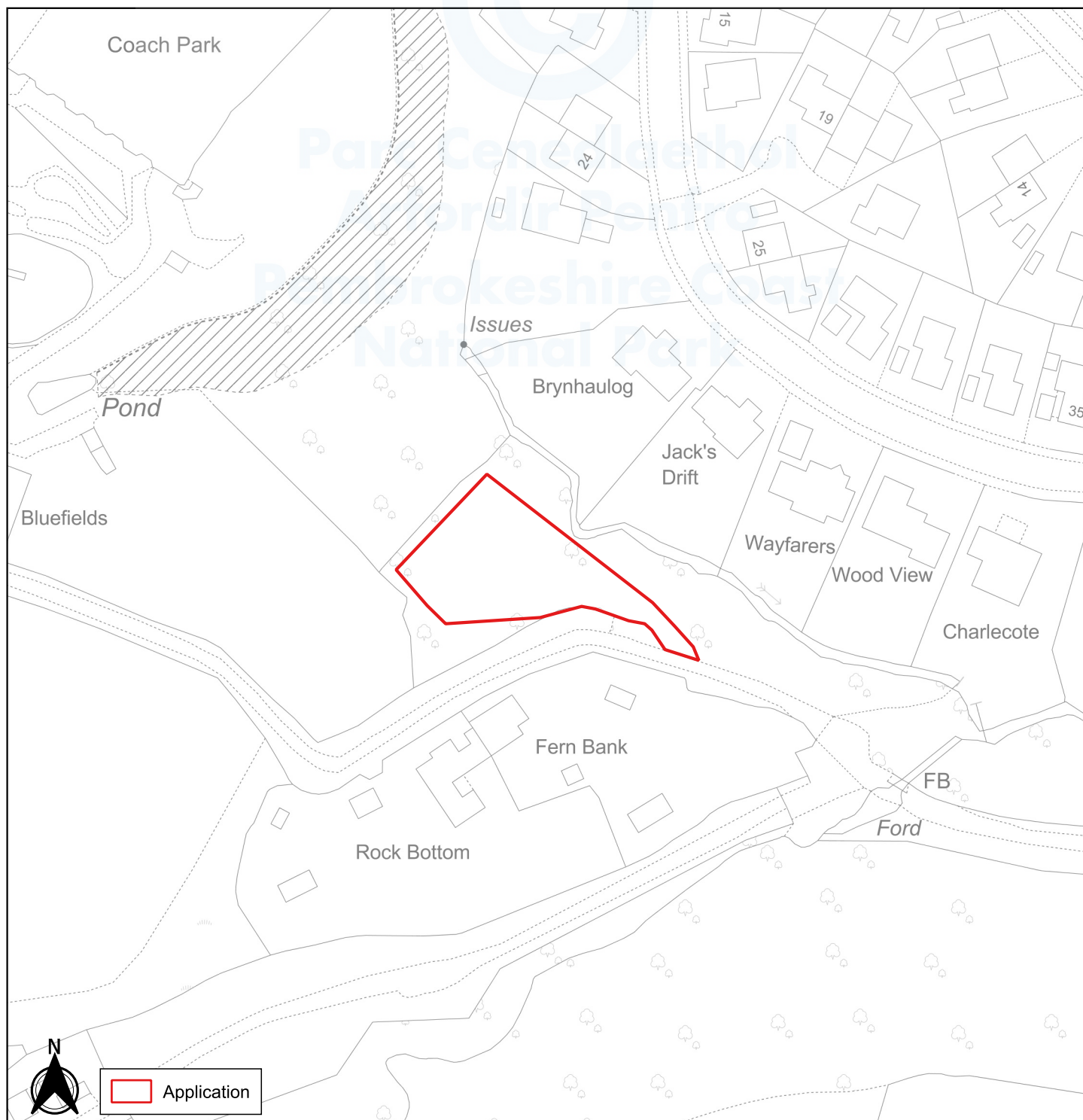
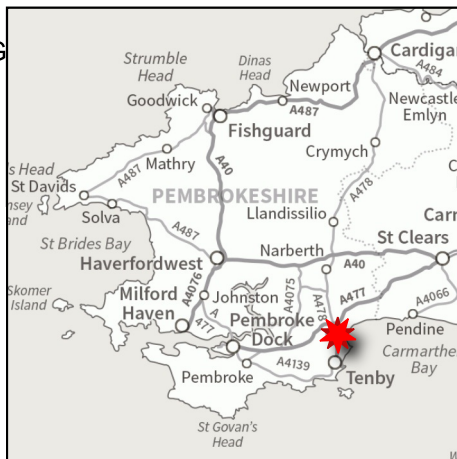


Land at Froghall Yard, Moreton Lane,
Saundersfoot, Pembrokeshire, SA69 9JG



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250





PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT

Ref No: NP/25/0536/FUL

Proposal: The creation of one traveller site incorporating one static caravan, one touring caravan, one day/utility room & ecological enhancements & woodland creation on the surrounding land (partly retrospective)

Site Location: Land at Froghall Yard, Moreton Lane, Saundersfoot, Pembrokeshire, SA69 9JG

Recommendation: Refuse

The application is being brought to the Development Management Committee in accordance with the scheme of delegation, as the Director with responsibility for Planning considers that it raises matters of public and/or Member interest.

Summary:

This application is a resubmission of a previously refused scheme, this application has added additional proposed ecological enhancements beyond that included in a previous application. The site is subject to an enforcement notice.

The main issues are whether the need for the additional traveller caravan site provision in the area and the 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 has been submitted for examination.

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 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). The proposal comprises one 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 and 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 potentially negative, with uncertainty about the definitive impact due to the lack of a baseline assessment prior to clearance.

The report recommends refusal of the application on the basis of landscape impact and potential harm, including loss of habitats and inadequate provision of Green Infrastructure.

The application documents can be viewed via the following link: [Citizen Portal Planning - application details](#)

Consultee Responses

- **Saundersfoot Community Council** – On 06/11/2025, Councillors unanimously determined that the minor alterations (e.g., managed tree planting) do not affect our previous objections (as listed below) and voted unanimously to Object to the application.

Councillors make the following comments for consideration by the National Park:

- Inappropriate Location / Conflicting with National Park Purpose**
The site is agricultural land with no caravan or other use for over 30 years. This previously unspoilt location is an important part of the landscape setting of the village.
Development would conflict with the statutory purposes of National Parks: conserving and enhancing the area's natural beauty, wildlife, and cultural heritage. The site is overlooked from Incline Way above and cannot be adequately screened.
Two previous planning applications have been rejected on the site. PCNPA should be consistent with previous decisions.
This is agricultural land, outside the settlement boundary and would conflict with the LDP. Also, the site is too close to the stream, posing a potential pollution risk to the blue-flag beach. Concerns were expressed over sewage system capacity.
- Damage to Biodiversity and Wildlife**
Councillors were frustrated that extensive clearance work had already taken place on the site. Removing multiple mature trees and apparently disturbing a badger habitat.
There has been no ecological / biodiversity study of the site in its condition prior to the Applicant starting work without permission.
- Access**
Access is via a minor road/bridleway and is insufficient for safe vehicular access.
- Potential Precedent**
Permission here would be gross overdevelopment, setting a precedent for development literally anywhere throughout the National Park, including the additional land owned by the Applicant adjacent to the application site.
- Applicant Has No Local Connection to Saundersfoot Area**
The Applicant lives in Pontypool and claims no connection to the area. There is no rationale as to why the Applicant chose a site approximately 100 miles away from their home.

- **PCNPA Ecologist** – Refusal
- **PCNPA Tree and Landscape officer** – More information required, lack of information would justify refusal
- **PCNPA Access team** – No response

- **PCC Drainage Engineers** – No response to date
- **PCC Transportation and Environment** – Conditional consent and informative
- **NRW** – No objection
- **Cadw** – No response
- **Dwr Cymru Welsh Water** – Conditional consent and informative - The proposed development would drain to Tenby Waste water Treatment Works, which is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance. However, a scheme is planned for completion by 31st December 2029
- **The Coal Authority** – Standing advice due to site location within the Development Low Risk Area
- **Wales and West Utilities** – No response received to date
- **Western Power** – No response received to date

Public Response

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

Approximately 48 representations have been received (as at 05/01/2026). One response was from a planning agent who wrote on behalf of a group of local residents (number not provided), and another was from 12 local residents.

The concerns/objections within the representations received are summarised below:

Landscape

- Significant harm to the landscape, character, biodiversity and amenity of this part of the National Park
- Lack of landscape capacity for further caravan development
- Policy 41 and the supporting SPG on caravan development do apply to all caravan development, including Gypsy and Traveller sites within the National Park, and should be considered in assessing landscape capacity.
- The proposal is permanent caravan development in open countryside and a highly sensitive landscape area (LCA 1 Saundersfoot/ANT1) and is within a High Sensitivity Area, which should be avoided for further caravan development.
- Significant visual intrusion
- Impact on Special Qualities

Need

- No evidence of need for Gypsy/Traveller pitches in the National Park
- Whilst there is a need for Gypsy Traveller accommodation in the wider Pembrokeshire County Area, development in the countryside in the National Park should only be considered if no other option is demonstrated to show why the applicant needs to move specifically to this site.
- There is already an existing site in Kilgetty – it is unnecessary to create an additional facility within a protected National Park at the cost of environmental degradation.
- The applicant resides in Pontypool – Torfaen Council has sufficient pitches in this area to meet the forecast demand in excess of the next 5 years.
- One respondent has claimed that the applicant is not a traveller and that he currently lives in a house/bungalow and occasionally does some work for gypsy travellers. The respondent claims that they are aware of this because they themselves come from the gypsy traveller community.

Highway safety/Access

- No safe and direct access/highway safety concerns
- Access will cut across the path of the new Active Travel Route currently being created by PCC.
- 200m between the site access and the public highway
- Moreton Lane is a very narrow road with limited opportunities for traffic to pass through; it is a footpath/bridleway.
- No information on anticipated visitors and likely traffic/trip impacts from friends/family.
- Poor location and inadequate access to services
- Site access not suitable for larger/emergency vehicles.
- Applicant has a haulage company and may seek to move large machinery

Residential Amenity Impacts

- Loss of privacy to private rear amenity areas of properties on Incline Way
- Properties on Incline Way all overlook the proposed development
- Concerns over noise and light pollution

Ecology

- Ecological impacts, including loss of mature trees from previous clearance, resulting in loss of habitat, including badger habitat – mitigation proposed is incomplete and unproven
- The site was important for nature conservation and should be protected
- Proximity of development to the stream
- No record of baseline ecology prior to the removal of woodland was submitted with the application, and no baseline Biodiversity Metrics were undertaken prior to the removal of habitat or woodland.
- The GIS and Biodiversity statement does not address woodland creation, and without a robust baseline, any mitigation proposals and/or landscaping proposals cannot be judged robustly.
- The GIS does not address the removal of trees or harm to habitat caused.
- Evidence of badgers and their setts in close proximity to the site
- Site was cleared during Feb and March 2024, and during nesting season for birds, with potential harm to owls and woodpeckers caused. Tree loss will have impacted these species.
- Development has had an adverse impact on the ecological value of the site and fails to demonstrate no impact on protected species – development is therefore contrary to PPW in terms of GI and contrary to the statutory purpose of the National Park.
- Proposed mitigation is managed woodland as opposed to natural woodland – this is unacceptable.

Drainage

- Concern that the connection point is to a pressurised main and that Welsh Water have objected to similar other connections.
- Concern that a large amount of hardstanding has been laid and could cause surface water flooding – no drainage calculations submitted with the application. Percolation information should be submitted prior to determination, as otherwise, the soakaway on the site plan may not be appropriate.
- No clarity on the water supply source.

Policy/Statutory considerations

- Precedent concerns
- Concern that the applicant has not appealed the previous decision, and questions over why he has been able to resubmit another application

- Impact on the statutory duty of the National Park to conserve and enhance natural beauty, wildlife and cultural heritage.
- Location outside settlement boundary – no justification for this exception
- The key landscape characteristics for the Saundersfoot LCA 1, including preserving farmland and woodland patches, which this proposal would threaten.
- None of the five appeal decisions submitted by the agent for the application relates to a site within a National Park, and as this important statutory designation does apply, they have no relevance to the application site.

Other matters

- Capacity on site for further pitches in future – risk of increased visual intrusion
- Suggestion of a public ballot to determine the acceptability of the proposal.
- Personal distress caused by the clearance of the site to neighbours as a result of the loss of wildlife and habitat
- Multiple residents of Incline Way since 1984 do not recall any caravans on the site since 1993.
- Application was refused in May 2025, and nothing new has been brought to the table, so regard the resubmission as somewhat cynical
- Property value
- Community cohesion
- Applicants' history of non-compliance
- Questions over the provision of electricity and the delivery of gas/oil on site.
- Questions about why the personal information provided with the application is confidential

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

Policies considered

Development Plans

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

Future Wales: The National Plan 2040 [Future Wales: The National Plan 2040](#) (FW)

Welsh Government Circulars

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

Local Development Plan 2 (Adopted September 2020)

Additionally, within the Pembrokeshire Coast National Park, the Local Development Plan 2 (LDP2) is the relevant development plan, and the following policies apply 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)

Planning Policy Wales (PPW12)

PPW12 sets out the land use planning policies of the Welsh Government.

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.

- [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 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

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: [Supplementary Planning Guidance \(LDP2\) - Pembrokeshire Coast National Park](#)

- 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 50m
- Ancient Monument - within 500m
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- Affordable Housing Submarkets
- Landscape Character Area

Officer's Appraisal

1. Site and Proposed Development

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. Seven properties are located in close proximity to the application site, with five of them to the north-east within Incline Way, whose rear gardens back onto 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 covers approximately 1013 square metres and 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.

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 and a detached day/utility room. The current description references ecological enhancements and notes that the development is partly retrospective.

2. Relevant Planning History

- NP/24/0638/FUL – The creation of one traveller site incorporating one static caravan, one touring caravan, a day/utility room and ecological enhancements (partially retrospective) refused by Committee 21 May 2025
- 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
- Pre-application enquiry PA/21/0114 – Proposed 2-storey dwelling and detached 3-car garage – Response sent with recommendation of refusal

Recent Enforcement Action on the Site

- EC22/0091 - Alleged clearing of land for access - This case was opened on 7th July 2022 following information from a neighbour that the land was being gradually cleared to provide access and to store a caravan. A pre-application was received regarding a property on the land. The landowner was informed that approval was unlikely. The enforcement case is still open/monitoring.
- EC24/0029 - Alleged unauthorised siting of caravan - This case was opened on 7th March 2024 following a report that a caravan was sited on the land. (New Landowner since the previous enforcement case). Unable to take enforcement action on the touring caravan until 28 days had lapsed. Further reports informed us that drainage was being installed. Temp Stop Notice issued on 19th July 2024, requiring the landowner to:
Ceasing the use of the land for the siting of a mobile home for residential and/or storage purposes; and
Removing the drainage pipes and any associated apparatus present from the land
- An Enforcement Notice was issued on 16th September 2024, containing the same information as the Temporary Stop Notice.
- The enforcement appeal, starting on 26.09.2024, was lodged on Ground G. Appeal Decision on 20/03/2025 - Appeal Dismissed and EN upheld
Enforcement Case is open.

3. Key Issues

The application raises the following planning matters:

- 3.1 Policy and Principle of Development
- 3.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 3.3 Amenity and Privacy
- 3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 3.5 Access and Parking
- 3.6 Surface Water Drainage and Foul Drainage
- 3.7 Impact on Scheduled Ancient Monuments
- 3.8 Other Matters

3.1 Policy and Principle of Development

- 1 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).
- 2 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.
- 3 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...'.
- 4 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.
- 5 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.
- 6 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'
- 7 Section 149 of the Equality Act 2010 prohibits racial discrimination by planning authorities in carrying out their planning functions. In addition, most public authorities, including local authorities, have a general duty under the 2010 Act to actively seek to eliminate unlawful discrimination, to advance equality of opportunity, and to foster good race relations in all they do.
- 8 This application seeks permission, partly in retrospect, for a gypsy traveller site. The site lies outside the settlement boundary for Saundersfoot, which is designated a Local

Centre in the Local Development Plan 2 (LDP2). The location is therefore classified as Countryside, where development must be strictly controlled.

- 9 The site also falls within Landscape Character Area 1 – Saundersfoot Settled Coast. The site is immediately adjacent to the Centre Boundary. Seven properties are located in proximity to the application site; five are to the north-east within Incline Way and have their rear gardens backing onto the site. Two further adjacent properties are on the opposite side of Moreton Lane, which also provides access to the application site, and a sewage treatment works is located further to the south-west. The application site covers approximately 1,013 square metres and 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.
- 10 Saundersfoot Community Council (SSC) objects 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 village's landscape setting.
- 11 SSC claim that the development will conflict with the statutory purpose of the National Park, which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. In addition, they indicate that the site falls outside the settlement boundary, which conflicts with LDP2; that two previous planning applications have been refused on this site; and that the Authority should be consistent with previous decisions.

Definition of Gypsies and Travellers

- 12 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.
- 13 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 (paragraph 3).
- 14 The submitted information provided in the supporting Planning statement to the application states that the applicant belongs to a long-standing Romany Gypsy family, and generations have lived a traditional and cultural lifestyle, living in caravans all their lives. The statement states that the applicant and his partner currently reside in an overcrowded Traveller site in Pontypool, where living conditions are poor. It states current accommodation is 'totally unsatisfactory as it is being rented and is bricks and mortar'. The agent also submitted a separate statement indicating that there are no available public traveller sites in South West Wales. The agent stated that the applicant knows the Saundersfoot area well and owns this land, so it is a logical and most sustainable option to make this his home. The statement also indicates that PCC has nothing to offer regarding the current public sites available in the Pembrokeshire area.

- 15 Following the determination of the previous planning application NP/24/0638/FUL, the Authority received correspondence from a third-party stating that they had long-standing knowledge of the applicant and that he was not a Gypsy and had no Gypsy Traveller heritage. During the course of this application, a further third party has written to the Authority stating that they are a member of the Gypsy Traveller community and that they do not believe the applicant is a member of this community, but instead an individual who undertakes work for the community on occasion. The Authority requested information from the Agent acting on behalf of the applicant regarding the applicant's status. Supporting information in the form of a letter from Travelling Ahead: Gypsy, Roma and Traveller Advice and Advocacy Service has been provided alongside a statement from the applicant, including personal information about his history. Travelling Ahead is an advice and advocacy service funded by the Welsh Government. The letter notes that the writer, who is a staff member with Travelling Ahead, considers the applicant and his family to fall within the definition of a Gypsy Traveller and that the applicant currently resides in a rented bungalow on a Traveller's site near Pontypool. On balance, Officers of the Authority consider that sufficient evidence has been provided to indicate that the applicant and his lifestyle fall within the definition of Gypsies in paragraph 2 of Circular 005/2018.
- 16 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 (l) supports, in principle, the need for a Gypsy and Traveller site in a countryside location, subject to the criteria in policy 53. LDP 2, Policy 53 'Gypsy, Traveller and Showpeople Sites' sets out a range of criteria for assessing proposals for new sites.

Gypsy and Traveller Accommodation Needs in Pembrokeshire

- 17 LDP 2, policy 53, criterion a) requires the demonstration that there are no suitable pitches available within existing authorised sites or land available within existing settlement limits. Information from Pembrokeshire County Council (PCC) Housing Department (January 2026) states that there are 82 local authority-managed pitches in Pembrokeshire. There are three void pitches in the North of the County, all of which are awaiting reconfiguration and will remain vacant until works are completed. 1 in the South of the County is also void, awaiting major works. 3 further pitches in the South are currently closed and not counted in the 82 figure. We have no unauthorised encampments at the time. There are 19 people on the pitch waiting list. All of whom are waiting for a pitch in the South area of the County. 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^[1]. The GTAA 2019 identified an immediate need for nine residential pitches over the 2019 to 2024 period, with a net additional need of 30 pitches over the 2025 to 2033 period. The locations identified by people in need are generally in the south of the county, with Haverfordwest the farthest to the north. There is no specific identified need for pitches in the National Park.
- 18 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 rests with Pembrokeshire County Council, in its role as the local housing authority.
- 19 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 2024¹. The GTAA 2019 identified an immediate need for nine residential pitches over the 2019 to 2024 period, with a net additional need of 30 pitches over the 2025 to 2033 period. The locations identified by people in need are generally in the south of the county, with Haverfordwest the farthest to the north. There is no specific identified need for pitches in the National Park.

- 20 The Housing (Wales) Act 2014 requires the local housing authority to carry out a GTAA every 5 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.
- 21 Information from PCC has confirmed that the immediate need for nine pitches was met by the end of 2024 and that 14 pitches had been granted permission as of March 2025, plus one travelling showperson's yard. Taking into account the agreed pitches, work has begun to meet the longer-term need for the additional 30 pitches over the period 2025 to 2033, which has been reduced to 25 pitches. Since the previous application on this site, a further two pitches have gained permission at Pincheston Farm, allowed on appeal on 03/09/25.
- 22 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. LDP2, policy 53 'Gypsy, Traveller and Showpeople Sites' sets out a criteria-based policy for assessing applications for new Gypsy, Traveller and Showpeople sites.
- 23 PCC adopted LDP (adopted 2013), allocated two sites for Gypsy and Travellers in Policy GN.31 'Gypsy Traveller Sites and Pitches Allocation'. Since the 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 noted above, 14 private pitches have received planning permission within PCC's planning jurisdiction since 2019.
- 24 PCC consulted on its re-Deposit LDP2 from 21 October until 16 December 2024. The Re-Deposit LDP2 identified 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.
- 25 The WG representation² 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 questions, 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."
- 26 Pembrokeshire County Council published a Focused Changes Report in October 2025, which included FC5.GN24.01 removes the Castle Quarry site reference GT/LDP2/01 and amends the sizes of other sites, resulting in a submitted Plan to the Inspectorate

¹ [LDP2 Evidence Base - Pembrokeshire County Council](#)

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

that allocates 31 pitches across three sites. WG did not make representations on this change during the public consultation.

GN 24 Gypsy and Traveller Site Allocations

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			
<p>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.</p> <p>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.</p>			

Gypsy and Traveller Caravan Count

- 27 The Gypsy and Traveller caravan count from Jan 2025³ recorded Pembrokeshire as having 178 caravans, of which 171 are authorised. Table 1 recorded 112 caravans on authorised sites run by the local authority and 59 caravans on authorised private rented sites. Table 2 records five authorised local authority sites in Pembrokeshire and 24 authorised private sites. This is the highest number of authorised sites in Wales. Table 3 shows that the local authority provides 80 occupied residential pitches and three vacant residential pitches.

³ <https://www.gov.wales/sites/default/files/statistics-and-research/2025-04/gypsy-and-traveller-caravan-count-january-2025.ods>

- 28 Some representations to the application have raised concerns that the applicant is not local and has not demonstrated a local connection sufficiently. Representations have also suggested that there is adequate provision in Torfaen Council to meet any identified Gypsy Traveller accommodation need in that area. The Authority has assessed these points, which are addressed below.
- 29 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 Circular 005/2018, paragraph 65). The supporting statement indicates that the applicant and family currently reside at Glascoed, on the outskirts of Pontypool. Whilst this does not preclude them from seeking an alternative site, there is no specific lack of accommodation for the applicant and his family, nor are they currently homeless. The applicant's cultural preference for a caravan is noted but not considered an urgent need.
- 30 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).
- 31 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 for 2025 to 2033 is being addressed through allocations in PCC's LDP2, which is scheduled for adoption in May 2026. As such, Officers recommend that moderate weight should be attached to the level of need for a site.
- 32 The Torfaen Gypsy and Traveller Accommodation Assessment identifies the level of need until 31 March 2033 and was approved by the Welsh Government in July 2024. The GTAA identifies that there are currently 54 Gypsy and Traveller households located on five sites in Torfaen. The Torfaen GTAA estimates an increase to 65 households (an increase of 11 households) by 2025 and an increase to 79 households (an increase of 24 households) by 2033. The GTAA notes that, taking into account permanent pitches likely to become vacant in the future, and with 21 permitted pitches yet to be built at the Council's Lower Shepherd's Hill site, the immediate need can be met. Unmet need for seven new permanent pitches up to 2033 may be met through permission for 10 new permanent pitches in the current LDP.
- 33 Whilst there is evidence to show that there is accommodation capacity in Torfaen, Gypsies and Travellers are nomadic, and the local planning authority is required to determine applications for development from anyone who submits them. As stated in Circular 005/2018, Planning for Gypsy, Traveller and Showpeople Sites states: "Planning authorities should not refuse an application because the applicant has no local connection" (paragraph 65).

- 34 LDP2 Policy 53, criterion b) 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 offers a range of services, including education and health facilities (a primary school and a doctor's surgery), as well as access to shops. The site is therefore considered to be well located in accordance with criterion b.
- 35 LDP2 Policy 53, criterion c) permits proposals where the site has good access to a public road which is safe and direct. The site is accessed via a non-classified road called Moreton Lane. The Highways Authority has been consulted on the road's suitability for access. It must also be noted 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 applicants and emergency vehicles.
- 36 LDP2 Policy 53, criterion d) supports development where the site is suitable for the development and on-site services and facilities can be adequately provided. 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"(paragraph 62). 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.
- 37 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 on any mitigation or restoration measures to repair damaged habitats or disturbed species, as detailed in the report below. All development must deliver a net benefit to biodiversity and ecosystem resilience relative to the baseline state, prior to clearance.
- 38 LDP2 Policy 53, criterion f) states the proposal should not cause significant visual intrusion and should be sensitively sited in the landscape with satisfactory landscaping provided. 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." (paragraph 37).
- 39 Overall, officers consider that whilst some elements of Policy 53 (Gypsy, Traveller and Showpeople Sites) are met by the proposal, the proposal has not demonstrated that it meets criterion d or criterion f based on its potential landscape impacts and lack of information on potential harm to habitats. These points are discussed in further detail below.

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

- 40 A number of representatives have raised concerns about potential impacts on the landscape (both of 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 negatively on the Special Qualities of the National Park.

- 41 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.
- 42 LDP2 Policy 8 ‘Special Qualities’ requires the special qualities of the National Park to be conserved and enhanced. The National Park’s Partnership Plan⁴, 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
- 43 Policy 8 (Special Qualities) includes criterion g, which specifies that species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value.
- 44 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.
- 45 Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
- 46 The Authority’s adopted Supplementary Planning Guidance (SPG) on ‘Caravan, Camping and Chalet’ development was prepared to support LDP2 Policy 41 ‘Caravan, Camping and Chalet Development’. 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.
- 47 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.

⁴ [1-Partnership-Plan.pdf](#)

- 48 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 south west.” 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 the south west, are narrow and need 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.
- 49 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 will have an unacceptable adverse effect on the National Park landscape, particularly for walkers on the PROW, and is therefore contrary to Policy 41.
- 50 The proposed development will have a 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, landscaping, and other built structures, the impact on the wider landscape will be more limited.
- 51 The proposed site is 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.
- 52 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 Specialist has identified as likely to be a woodland edge feature related to the adjacent protected woodland to the north. Limited 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 habitat. This concern was one of the reasons the Authority issued a temporary stop notice and an Enforcement notice at this site (see the planning history above).

- 53 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. The agent has submitted a statement which states, '*Only 2 private cars would be used on site and no industrial / business vehicles. The client already has a rented yard or land where he stores business-related vehicles/materials. In this respect, however, the size of this current application site would prohibit the storage/siting of any associated business vehicles.*'
- 54 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.
- 55 Officers consider that the development of a traveller site incorporating one static caravan, one touring caravan, a 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 and would therefore be contrary to LDP2 Policies 1, 8, 14 and 41.

3.3 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 recommended for approval, and that planning enforcement would 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 a 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 wider 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.

3.4 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 biodiversity value is maintained, there must still be a proactive process to identify and secure enhancements through the design and implementation of the development.

64 SCC 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 question of whether an ecological/biodiversity report has been submitted to support the application and to inform the original site condition. These points have also been raised by other third-party respondents.

65 SCC 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 Specialist has identified as likely to be a woodland edge feature related to the adjacent protected woodland to the north.

67 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.

68 PPW 12 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.

69 A standalone Green Infrastructure Statement demonstrating how the step-wise approach (Paragraph 6.4.15 of PPW12) has not been provided with this application, which is now a planning requirement.

70 Baseline data:

The stepwise approach is referenced; however, no baseline data for the site prior to the 2022 clearance to prepare it for the proposed development are provided. Referring to GIS Phase I habitat data (see image below), the site is predominantly categorised as dense scrub. Prior to clearance, this area was likely an important transitional habitat of

scrub connecting the two woodland areas adjoining the site to the north-west (TPO 93 W1) and south-east (TPO 77 W1).

- 71 Section 6.4.16 of PPW12 requires baseline data and notes 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 (Aerial Image 2026), its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place.'
- 72 Reference to aerial images (See images below) shows the site prior to clearance with tree and scrub covering the site (Aerial Image 2017); however, baseline data prior to clearance has not been provided, and the lack thereof prevents this authority from assessing whether the proposed landscaping will result in a Net Benefit for Biodiversity upon completion and establishment of the proposed development.
- 73 By referring to GIS Phase I habitat data (see Phase 1 habitat data image below), the site is predominantly categorised as dense scrub. Prior to clearance, this area was likely an important transitional scrub habitat connecting the two woodland areas adjoining the site to the north-west (TPO 93 W1) and south-east (TPO 77 W1). Woodland edge feature related to the adjacent protected woodland to the north, which is protected under TPO93 (see TPO93 image below)
- 74 By referring to GIS Phase I habitat data (see Phase 1 habitat data image below), the site is predominantly categorised as dense scrub. Prior to clearance, this area was likely an important transitional scrub habitat connecting the two woodland areas adjoining the site to the north-west (TPO 93 W1) and south-east (TPO 77 W1). Woodland edge feature related to the adjacent protected woodland to the north, which is protected under TPO93 (see TPO93 image below)
- 75 Section 6.4.16 of PPW12 also notes that 'A net benefit for biodiversity must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.'
- 76 Phase 1 data (See image below) and the aerial images show that prior to clearance, the site was established with scrub and trees. Scrub is a valuable transitional habitat that, in this instance, along with the riverine corridor, would have connected the two adjacent woodlands. The loss of this tree and scrubland habitat will have a detrimental impact on habitat connectivity across the greater area and will require assessment and restoration.

Avoid / Minimise (Step-wise approach)

- 77 Figure 12 of PPW12 (below) shows the step-wise approach with the first two steps looking to avoid and minimise impacts on habitat and species; however, the site has been predominantly cleared resulting in not only a loss of habitat, but also a loss of connectivity between to the two woodlands and exposure of the waterway along the northern boundary.

78 When referring to the DECCA framework as part of the step-wise approach, the key issues are:

- Diversity
- Extent
- Condition
- Connectivity
- Adaptability

The clearance of the site has resulted in the detrimental impact and / or loss of a diverse transitional scrub habitat, riverine corridor and connectivity between other habitats.

Google image – 2026 - Approximate greater site boundary overlaid.



Aerial image (2017) - Showing greater green infrastructure coverage



Phase 1 habitat data image

Once site-specific baseline data has been provided, the authority will be able to assess the proposal accordingly.

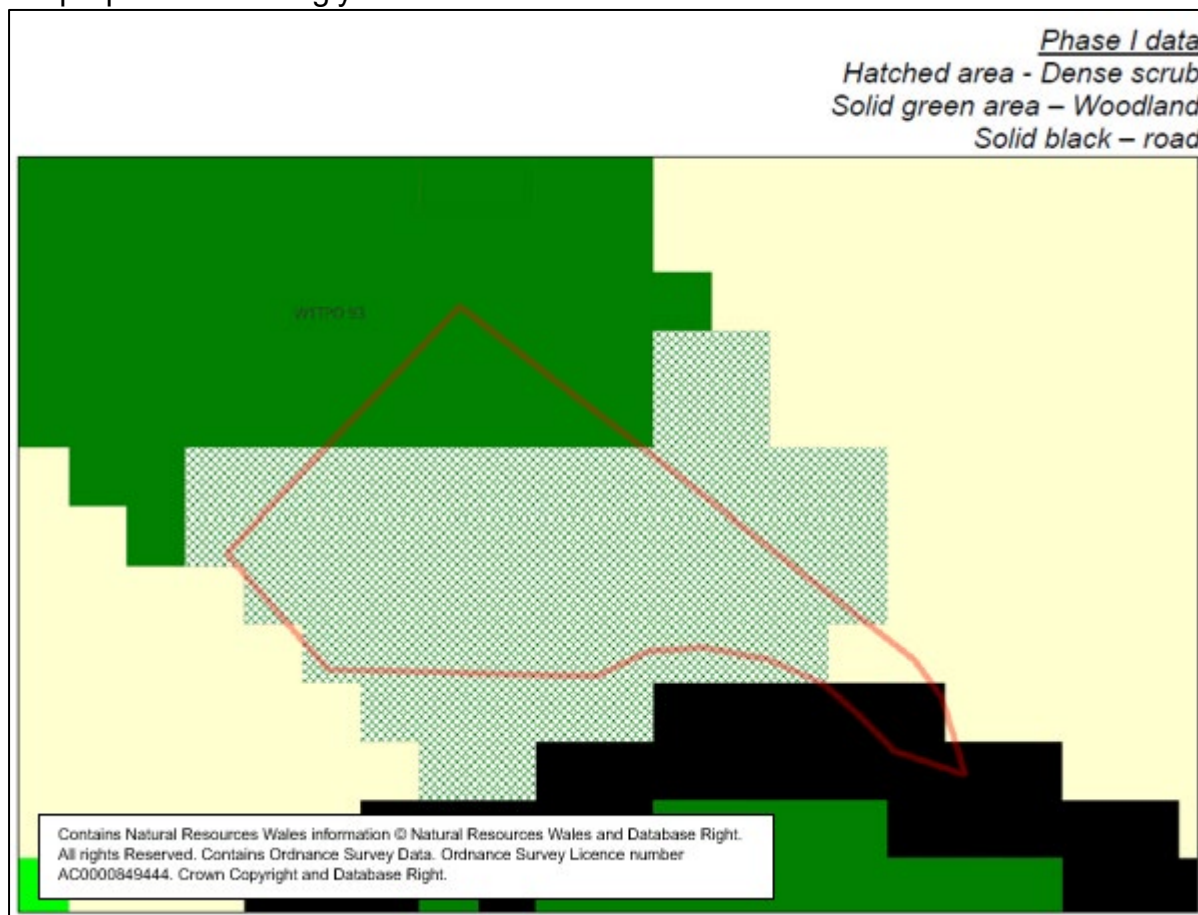
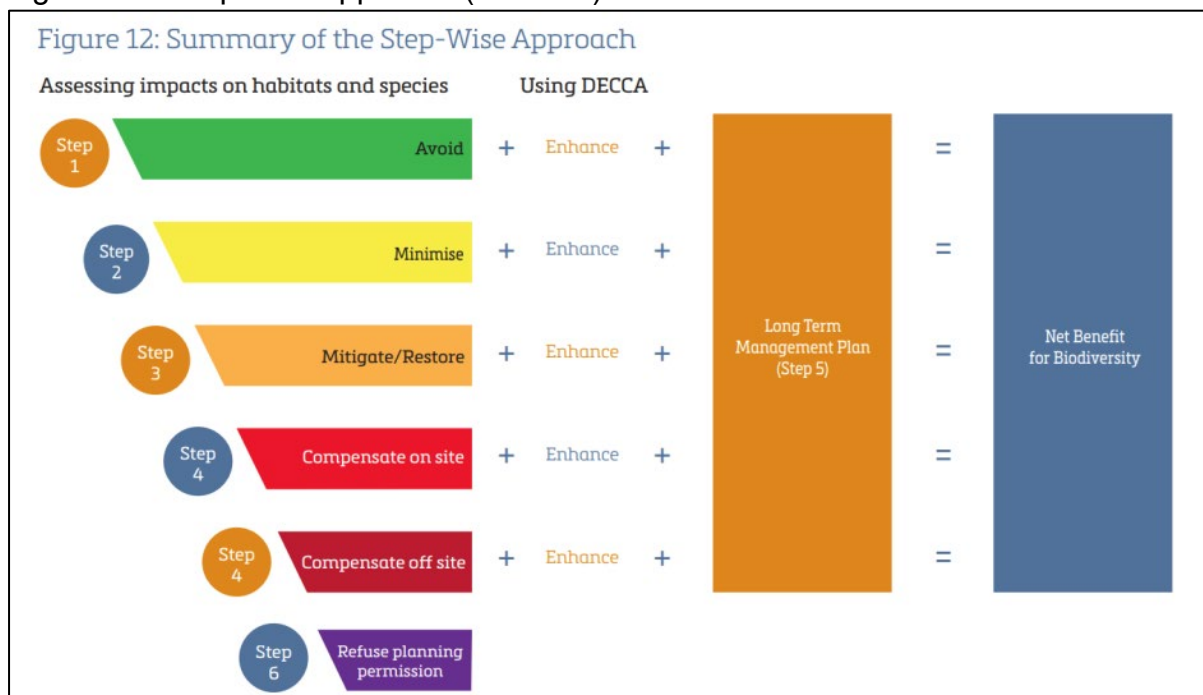


Figure 12 – step-wise approach (PPW 12)



Mitigate/restore (Step-wise approach)

- 79 Any proposed mitigation or restoration must carefully consider these habitat impacts by restoring connectivity between the woodlands, restoring tree and scrub features within the greater site, and restoring the riverine corridor. The information provided is not considered to address these issues robustly for this authority to suitably determine the proposal.
- 80 Landscape details have been provided on Plan 02a and Plan 03a, proposing a 'managed tree planting zone' comprising predominantly native species of trees, shrubs and climbers. This is acceptable in principle; however, the species still needs to be grounded in baseline data and an assessment of adjacent habitats to ensure cohesion. There is also no detail on the numbers, layout, structure, management, or maintenance to assess the suitability of this as adequate mitigation.
- 81 The arboricultural review (ARW 1711) refers to possible mitigation planting on site, and Drawing 04d also includes proposed planting on site; which is acceptable in principle; however, there is no justification that proposed planting will mitigate and enhance the site based on previous losses.
- 82 It would be advised that the landscaping proposals are based on the findings of the baseline data and the ecological recommendations of restoring the loss of habitat on site.
- 83 Preliminary Ecological Appraisal by I & G Ecological Consulting Ltd has been submitted with this application. This was done to understand the baseline conditions of the site; however, it only included a limited area of the site (red line), and it did not include the wider site (blue line), as shown below.
- 84 Section 3.2.7 of the report does attempt to detail the ecological importance of the surrounding area. However, this is limited to the wooded area to the northwest (within the TPO) and the riverbank, which was identified as being "rich in ferns and bryophytes". No mention is made of the area to the southeast, presumably because this survey was conducted after site clearance.

Enhancement/NBB (Step-wise approach)

- 85 Section 6.4.42 of PPW12 notes that 'Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15.
- 86 Where loss is unavoidable, developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value, including biodiversity, landscape value and carbon capture).
- 87 Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost, and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or shelterbelt

area is lost as part of a proposed scheme, the compensation planting must be at a scale, design, and species mix reflective of the area lost.



The report identified the presence of three habitats on site within the red line as follows:

- A1.1.1 - Broadleaved woodland
- B2.2 - Semi-improved neutral grassland
- J4 - Hard standing

TPO93 image



- 88 In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves and 2500 trees per hectare for conifers. The planting position for each replacement tree shall be fit to support its establishment and health and ensure its unconstrained long-term growth to optimise the environmental and ecological benefits it affords.
- 89 In terms of enhancing the proposed site upon completion to ensure that a Net Benefit for Biodiversity is achieved, baseline data will be required. The greater site area is approximately 0.272 hectares, with the application site noted as '1013 sq metres' on Drawing 02a (equivalent to 0.1013 hectares). The landscaping proposals show a 'managed tree planting zone' that may serve as a riverine corridor, provide connectivity between the two woodlands, and offer scrub habitat (depending on the planting structure).
- 90 The lack of baseline data for how many trees were removed, and the lack of specific trees proposed for planting, means the authority is unable to assess if the development will:
- a) Mitigate tree losses
 - b) Enhance overall tree numbers*
 - c) Mitigate scrub habitat loss
 - d) Enhance scrub habitat
 - e) Mitigate riverine corridor habitat loss
 - f) Enhance riverine corridor habitat
 - g) Mitigate/enhance connectivity losses (dependent on prior and proposed habitat)
- * In terms of tree numbers, it is also unclear what the proposed landscaping is based upon, i.e. the 3:1 planting ratio, woodland/shelterbelt planting percentages per hectare.
- 91 The greater site that has undergone clearance is 0.272 hectares, so using the 1600 broadleaf trees per hectare would require planting of approximately 435 trees for the site area. The application site is 0.1013 hectares, so using 1600 broadleaf trees per hectare would require approximately 162 trees for the application site. This could incorporate native scrub species within the site, focused on structural planting to ensure tree cover and scrub habitat is implemented; however, at this time, there is insufficient information.
- 92 The site in question has undergone extensive pre-development site clearance, resulting in the detrimental impact/loss of various biodiversity and habitat features (riverine corridor, scrub habitat, tree cover).
- 93 The Authority's Ecologist has assessed the application and the documents submitted to date.
- 94 The proposed site has previously been refused under planning application NP/24/0638/FUL. A reason for refusal at this time was the significant site clearance, biodiversity impacts, and lack of green infrastructure provision. The response from Ecology regarding that application highlighted the need to undertake a Preliminary Ecological Appraisal (PEA). This application has attempted to address some of these concerns. However, we believe the information provided is inadequate and does not address pre-site clearance, the required information to mitigate risks, or opportunities to further improve biodiversity on site.

- 95 A suitably qualified ecologist did not survey this area prior to the clearance, and as such, we do not have a definitive baseline from which to assess the application and whether or not it would achieve a net benefit for biodiversity. The submitted Green Infrastructure Statement and PEA do not address pre-site clearance, nor has any evidence been provided to demonstrate the remaining evidence for the wider site. As such, we would presume that the habitat that existed prior to the site clearance was in good condition and contained dense scrub and semi-mature trees which linked two sections of broad-leaved woodland.
- 96 Scrub land, along with open mosaic habitat is included in the 2007 review of UKHAB definitions (Report on the Species and Habitat Review (UK BAP / JNCC), Report by the Biodiversity Reporting and Information Group (BRIG) to the UK Standing Committee, June 2007, for more information about the UK Biodiversity Action Plan (UK BAP) visit: <http://www.jncc.gov.uk/page-5155>). The report states:
'various types of scrub provide essential or important habitat requirements for many species of higher plants, herbivorous insects and birds, including Red Data Book and UK BAP priority species. It is also likely to be equally important for lower plants, non-herbivorous invertebrates, reptiles and amphibians, and mammals. There are several Annexe I types based on scrubby formations, including coastal and heath types, montane willow scrub, juniper scrub, and scrubland facies on calcareous grasslands. It was recommended that scrub habitats should be dealt with as an integral component of the various woodland, coastal, grassland, wetland, heath, rock and hedgerow priority habitats, rather than being considered separately.'
- 97 Whilst scrub does not have its own category because it was decided that it fits into other protected habitat types, scrub land has a high biodiversity value and includes many notable protected species, including high numbers of breeding birds, and in this case, provides potential breeding and resting sites for otters.
- 98 Whether the cleared land is classified as having trees or scrub, there is still a need to mitigate the loss and achieve a net benefit for biodiversity.

Nesting Birds

- 99 The pre-emptive clearance of vegetation likely to support nesting birds has removed breeding habitat prior to the PEA and application submission. This action has hindered the authority's ability to determine the extent of impacts on nesting birds and to secure proportionate mitigation or compensation measures.

Badgers

- 100 The information provided in the planning application does not adequately address the development's impact on Badgers. The PEA notes that the adjacent woodland and grassland provide foraging opportunities for badgers. It does not comment on the loss of scrub area for foraging opportunities, nor has this area been surveyed for badger setts.
- 101 Evidence has been submitted from a third party claiming badgers were using the site. This would be consistent with records of surrounding species and with the habitat's suitability for badgers. As stated previously, it must be assumed that prior to the clearance, the habitat on site was in good condition and therefore that there was a high likelihood that badgers were using the site for foraging and commuting.

102 Badgers are protected under the *Protection of Badgers Act 1992*. While this act does not protect foraging or commuting areas, it does make it illegal to “damage, destroy or obstruct access to a badger sett”. Whether the work completed to date should have benefited from a European Protected Species licence is a matter for enforcement by Natural Resources Wales.

103 There is insufficient information regarding the impact of the development on badgers, which may have occupied the wider site.

Otters

104 We are not satisfied that the development would avoid harm to otters *Lutra Lutra*, which are a European Protected Species (EPS) and a qualifying feature of the nearby Carmarthen Bay and Estuaries Special Area of Conservation (SAC). Woodland and scrub are particularly important habitats for otter natal dens ^{1,2}. Additionally, otter couches (resting places) occur in similar habitats but are found in patches of dense scrub adjacent to watercourses and woodland³. There has been a pre-emptive clearance of scrub, which could function as a resting or breeding habitat for otters. This occurred prior to an appropriate ecological survey, contrary to the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), which make it an offence to damage or destroy an EPS breeding site or resting place, or to disturb the species while occupying such a place. Furthermore, the clearance is in direct opposition to conservation objective 2a for otters within the Carmarthen Bay and Estuaries SAC (shown below):

‘2a. Accessibility to habitat used by otters Otter that use the SAC should not be significantly constrained from accessing necessary habitats within or outside of the site.’

105 The objective notes that “*It is vital that otters continue to have unimpeded access to habitats within and outside of the SAC that are necessary to restore the population that uses the SAC to favourable conditions. It is not only physical barriers or constraints that could reduce access to their habitat, noise and visual stimuli could also prevent otters from accessing an area.*” Although the PEA does not encompass the entire site area, it notes that otters could be adversely affected without adequate mitigation.

106 As mentioned above, the pre-emptive clearance has limited the ability for a proper assessment of likely impacts. In the absence of robust ecological evidence and given the loss of potential otter habitat, the proposal fails to demonstrate that impacts on otters and the integrity of the SAC would be avoided. There is no otter mitigation provided as part of the scheme, and there is insufficient information on the relationship between site clearance and replacement planting with regard to otter suitability.

Habitats Regulation Assessment

107 As the recommendation is to refuse planning permission, a Habitats Regulations Assessment (HRA) has not been undertaken. Under the Conservation of Habitats and Species Regulations 2017 (as amended), the competent authority is required to undertake an HRA only where it is minded to grant consent to a plan or project that may have a likely significant effect on a European site (Regulation 63). As this proposal is recommended for refusal, there is no pathway for authorising effects on the designated site; therefore, an HRA is not required at this stage. Should the Local Planning Authority be minded to approve the application contrary to this recommendation, an HRA would be necessary.

- 108 The lack of baseline data at the site limits the authority's ability to assess the application with respect to green infrastructure and net biodiversity benefits. Information has been provided; however, it is insufficiently detailed, and further information is required to make an informed response. The lack of this information when determining the application would justify refusal.
- 109 Section 6.4.16 of Planning Policy Wales 12 states that '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 proactive process to look for and secure enhancement through the design and implementation of the development.
- 110 Section 6.4.4 of Planning Policy Wales 12 notes that 'Where adverse effects on biodiversity and ecosystem resilience cannot be avoided, minimised or mitigated/restored, and as a last resort compensated for, it will be necessary to refuse planning permission.'
- 111 Section 6.4.12 of Planning Policy Wales 12 notes that 'Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.'
- 112 It would be reasonable to refuse an application on ecological and habitat impacts arising from land clearance, and on insufficient information to demonstrate that the application will result in a Net Benefit for Biodiversity.
- 113 Substantial pre-application clearance has already taken place, resulting in the loss of a wide range of habitats previously suitable for Otters, Badgers, and nesting birds. In accordance with PPW12, in the absence of baseline evidence, the pre-clearance habitat must be assumed to have been in good condition. On this basis, officers consider that the proposed scheme does not adequately address the loss of Protected Species habitat or demonstrate that appropriate mitigation or compensation measures will be secured.
- 114 Therefore, the proposal is recommended for refusal on the basis that the current application is not compliant with Section 6 of Planning Policy Wales (Edition 12), The Conservation of Habitats and Species Regulations 2017 (as amended), the Environment (Wales) Act 2016 and Local Development Plan 2 - Policies 8 (Special Qualities), 10 (Sites and Species of European Importance), and 11 (Nationally Protected Sites and Species).

3.5 Access and Parking

- 115 Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that support improved traffic and parking management. Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.

- 116 SSC has raised concerns about the access, which is via a minor road/bridleway, and they consider it insufficient for safe vehicle access. Other third parties have also raised similar concerns.
- 117 The Authority's Access and Rights of Way team have not responded to the current application to date, but responded on the previous application, which is considered not to differ and 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 has the right of passage on foot, by bicycle, and on 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.
- 118 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.
- 119 Pembrokeshire County Council Highways officers have been consulted. The proposed expanded site plan (DWG No. 03c) indicates that site access will be located approximately 30m 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 the verge widths on both sides of the access adequate, providing acceptable sight lines.
- 120 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 10m. In addition, any gates should be set back a minimum of 10m from the edge of the PROW to allow all vehicles, including those towing, to pull off the road while opening the gates, without causing an obstruction on the Public Right of Way. The parking provision and turning area for the site are acceptable, allowing vehicles to exit in forward gear.
- 121 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, if relied on, would require assessing whether emergency vehicles can use it, which would require a swept path analysis. This could be conditioned, if necessary, as a Grampian condition.
- 122 Pembrokeshire County Council Highways officers have not objected to the application, subject to planning conditions being imposed to control the location of access gates, the bound surface for the access track, and appropriate parking and turning within the site. They also request that an informative note be added to any consent granted for contact to be made on the naming and numbering of all roads and new developments to facilitate the provision of service connections.
- 123 Officers consider that, with respect to access and parking, the current proposal can be supported subject to the above conditions and would accord with Policies 59 and 60 of LDP2. This does not outweigh the other concerns with this application proposal.

3.6 Surface Water Drainage and Foul Drainage

- 124 Policy 29 (Sustainable Design) of LDP2 requires that all development proposals be well designed for water and drainage. Policy 32 (Surface Water Drainage) of LDP2 requires that development incorporate sustainable drainage systems to dispose of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.
- 125 SCC expressed concerns about the sewage system capacity for this development. Some third parties have also raised concerns that the proposed connection point to the foul system has been a location to which Dwr Cymru Welsh Water have objected to with other applications and are concerned that Dwr Cymru Welsh water has not correctly assessed the proposed location. Planning consultations are undertaken not only with a post code but also with all available plans published on the Authority's website.
- 126 Dwr Cymru Welsh Water (DCWW) confirm that the proposed site is located within the catchment of a public sewerage system which drains to Tenby Waste Water Treatment Works (WwTW). They have considered the impact of the foul flows generated by the proposed development and conclude that these flows can be accommodated within the immediate public sewerage system, whereas the WwTW has a phosphorus consent limit in place and is compliant with its final effluent permits. However, the WwTW is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance at the time of this consultation.
- 127 Notwithstanding this, in line with the environmental regulator's National Environment Programme, DCWW are required to deliver a scheme at the WwTW to ensure 95% quartile compliance with our FPF performance and therefore would insist that a planning condition be imposed on any consent granted to ensure that no buildings on the application site shall be brought into beneficial use earlier than 31st December 2029 unless the scheme at the Waste Water Treatment Works, into which the development shall drain, has been completed and written confirmation of this has been issued by the Local Planning Authority. This is required to prevent overloading of the WwTW and environmental pollution.
- 128 In addition, they request that an informative note be added to any consent granted to deal with a connection to the public sewer.
- 129 DCWW recognises that the application details state that the surface water will be disposed of via a soakaway within the site area. This disposal method is considered suitable 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'.
- 130 DCWW does not object in principle to the proposed method of surface water disposal and refers to separate consultation and agreement with PCC Drainage Engineers, but requests that a condition be imposed to ensure that no surface water or land drainage shall be permitted to connect directly or indirectly with the public sewerage network.
- 131 The drainage engineers at Pembrokeshire County Council have not responded to the current application to date, but indicated on the previous application which is considered to not differ from a drainage aspect than the current application that, given the site's location and proximity to ordinary watercourses, a condition is required to agree to 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 testing determines that a soakaway cannot be used to discharge surface water, an alternative drainage strategy must be submitted and approved by the Local Planning Authority, implemented as agreed, and thereafter maintained. The drainage engineers also confirmed on the previous application that the development would not require SAB approval. Given this position, if the Authority were minded to approve it, it would seek to introduce a condition to ensure the appropriate disposal of surface water is achieved.

- 132 Subject to appropriate planning conditions, 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.
- 133 Whilst drainage matters could be satisfactorily addressed by planning conditions, they are not considered to outweigh the other concerns with this application.

3.7 Impact on Scheduled Ancient Monuments

- 134 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 usually indicates they have no comment. 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 cause harm to the Scheduled Ancient Monument's setting.

3.8 Other Matters

- 135 The agent has submitted a range of previous appeals which cover Gypsy and Traveller accommodation provisions. Officers have assessed these appeals and do not consider them to reflect the same level of landscape sensitivity as an application located within a National Park; therefore, they are not considered to set a precedent for this site and have been given limited weight.
- 136 As set out in the policy section above, the Authority must consider its duties under both the Equality Act and the Human Rights Act 1998 when making its decision. Specifically, 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 the Welsh Government and the relevant policy of the Local Development Plan 2. 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). 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 reaching a recommendation, have weighed the individual's rights against the wider public interest to determine whether development should proceed. In this case, the potential harm to landscapes and habitats is considered to outweigh other considerations, resulting in a recommendation to refuse the application.

4 Conclusion

- 137 The proposed development has resulted in unacceptable landscape impact on the National Park and potentially disturbed species and habitats within the countryside. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. The adverse ecological and habitat impacts arising

from land clearance, together with insufficient information demonstrating that the application will result in a Net Benefit for Biodiversity, also constitute a reason for refusal.

- 138 In the absence of robust ecological evidence and given the loss of potential otter habitat, the proposal fails to demonstrate that impacts on otters and the integrity of the Carmarthen Bay and Estuaries Special Area of Conservation would be avoided.
- 139 The site is not considered suitable for development, contrary to the provisions of criteria d and f of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. As such, the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 10 (Sites and Species of European Importance), Policy 11 (Nationally Protected Sites and Species), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park), Policy 30 (Amenity) and Section 6 of Planning Policy Wales (Edition 12), The Conservation of Habitats and Species Regulations 2017 (as amended), the Environment (Wales) Act 2016
- 140 The proposal would introduce caravan development in an area of the National Park without landscape capacity, resulting in unacceptable cumulative impacts that are contrary to Policy 41: Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance.
- 141 Whilst it is recognised that 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 for 2025 to 2033 is being addressed through allocations in PCC's LDP2. It is also recognised that the applicant has no immediate need for accommodation. As such, moderate weight is given to the need, which does not outweigh the significant landscape and environmental harm identified in the proposal, which is given significant weight in this application. Impacts on residential amenity and on matters of access, drainage, and historic assets are acceptable or can be addressed appropriately through planning conditions; these matters do not outweigh the harm identified above. The proposal is therefore recommended for refusal.
- 142 In reaching a recommendation, due 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 has resulted in unacceptable landscape impact on the National Park and potentially disturbed species and habitats within the countryside. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. The application also fails to demonstrate a Net Benefit for Biodiversity. 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), Policy 30

(Amenity), (criteria d & f) of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2, Section 6 of Planning Policy Wales (Edition 12), and the Environment (Wales) Act 2016

2. In the absence of robust ecological evidence and given the loss of potential otter habitat, the proposal fails to demonstrate that impacts on otters and the integrity of the Carmarthen Bay and Estuaries Special Area of Conservation would be avoided. As such, the proposal is considered contrary to Policy 10 (Sites and Species of European Importance), Policy 11 (Nationally Protected Sites and Species), and Section 6 of Planning Policy Wales (Edition 12), The Conservation of Habitats and Species Regulations 2017 (as amended), and the Environment (Wales) Act 2016
3. The proposal would introduce caravan development in an area of the National Park without landscape capacity, resulting in unacceptable cumulative impacts that are contrary to Policy 41: Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance.