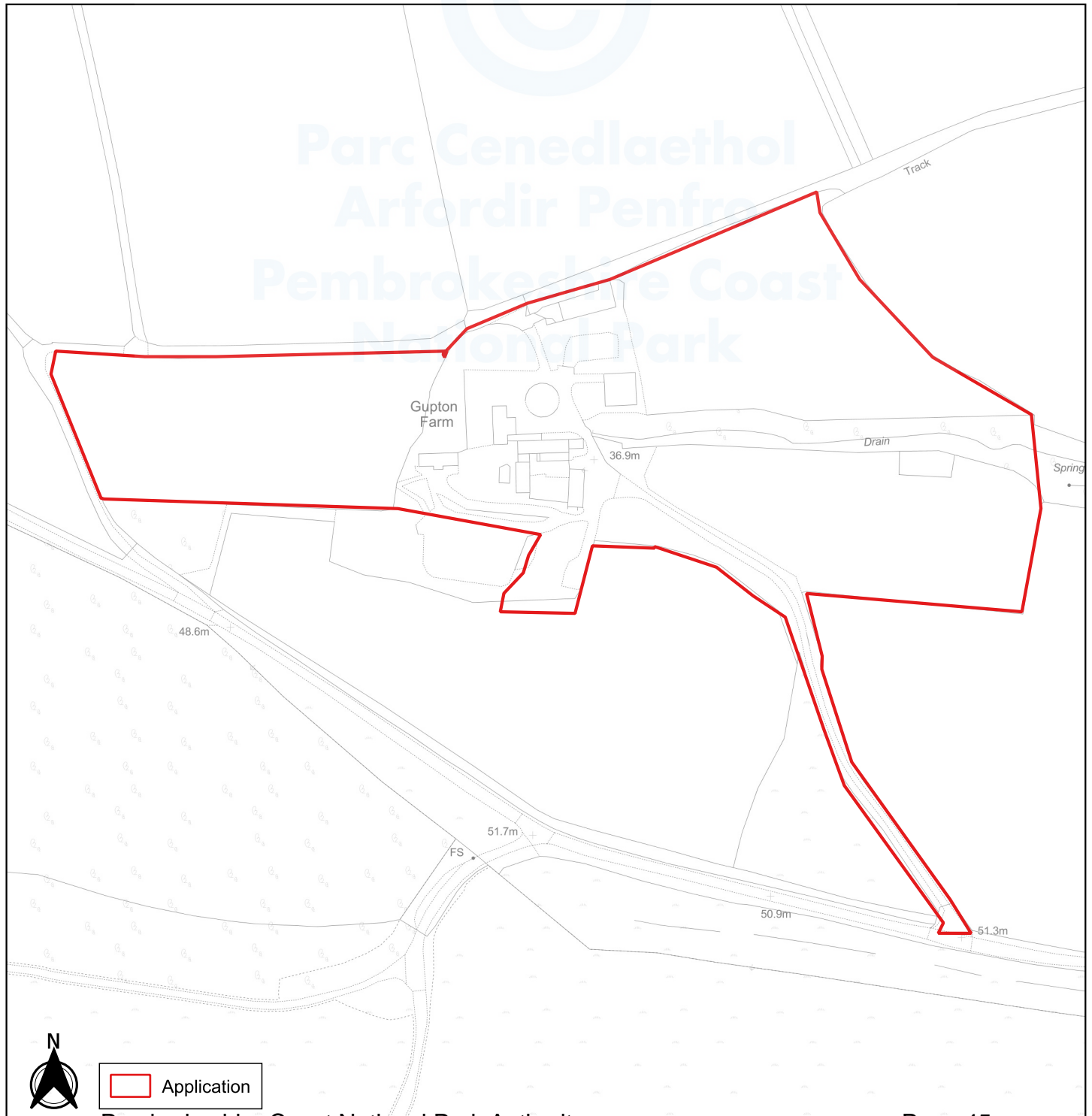
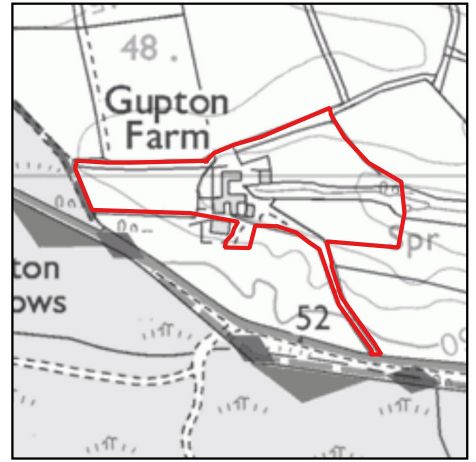
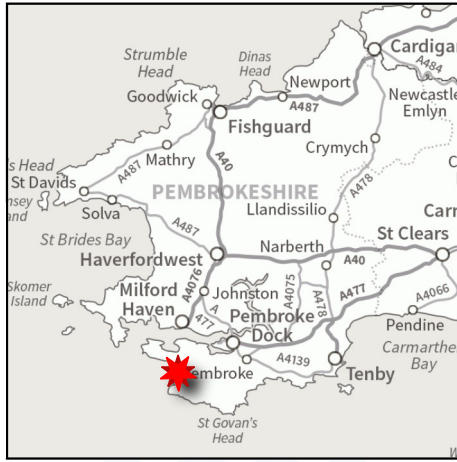


Site Location: Gupton Farm,
Castlemartin, Pembroke,
Pembrokeshire, SA71 5HW



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500





PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY DELEGATED DECISION REPORT

Ref No: NP/26/0154/FUL

Proposal: Change of use of land for camping, the seasonal siting of 5 landpods, seasonal siting of 20 campervans (max) and installation of 2 electrical hook up points

Site Location: Gupton Farm, Castlemartin, Pembroke, Pembrokeshire, SA71 5HW

Recommendation: **Approve**, subject to conditions

This application is being presented to the Development Management Committee as it is an application recommended for approval which is a departure from the adopted Local Development Plan 2.

Plans and documents may be viewed here: [Citizen Portal Planning - application details](#)

Summary:

The application seeks full planning permission for the change of use of approximately 4.5 hectares of land at Gupton Farm, Castlemartin, Pembroke, to provide a seasonal camping and tourism development comprising the seasonal siting of 5 landpods, up to 20 campervans and installation of 2 electrical hook up points together with associated landscape and biodiversity enhancement works.

Gupton Farm is located within the open countryside of the Pembrokeshire Coast National Park, approximately 1 km north-east of Freshwater West and forms part of the wider National Trust estate surrounding the Castlemartin Peninsula. The site occupies a relatively enclosed shallow valley landscape within Landscape Character Area Castlemartin/Merrion Ranges (LCA6) and currently operates as an established seasonal campsite under a National Trust exemption certificate.

The existing campsite has operated for approximately ten years and currently accommodates seasonal tent camping and a limited number of campervan pitches utilising existing site infrastructure including shower and toilet facilities, sewage treatment infrastructure, access tracks and parking areas. The proposal seeks to formalise and diversify the existing operation by allowing greater flexibility in accommodation type and pitch management whilst maintaining the existing overall site capacity of a maximum of 100 people and 50 pitches per night.

The submitted information confirms that the proposal does not seek to increase overall occupancy levels at the site but instead proposes a redistribution of accommodation types through increased campervan provision and the introduction of seasonal landpods. The landpods are proposed as free-standing seasonal structures with no permanent drainage or utility connections and would be removed from the site during December, January and February.

The application is supported by a comprehensive package of supporting information including a Landscape and Visual Impact Assessment, Landscape Design Workbook, Green Infrastructure Statement, Preliminary Ecological Appraisal, Ecological Enhancement Plan and detailed planting proposals. The submitted landscape strategy includes recessed pod siting, earth bunding, native hedgerow planting, scrub habitat creation, species-rich meadow establishment and wider biodiversity enhancement measures intended to integrate the development into the surrounding landscape and deliver ecological enhancement.

The application has been referred to the Development Management Committee as a major application and because the proposal represents a departure from elements of Policy 41 (Caravan, Camping and Chalet Development) and the Caravan Camping and Chalet Supplementary Planning Guidance due to the sensitive coastal landscape location within Landscape Character Area 6. However, officers consider that the seasonal nature of the proposal, the established exempted camping use, the absence of any increase in overall site capacity, the landscape-led design approach and the significant biodiversity and visitor management benefits weigh in favour of the proposal.

Consultee Response

- **Natural Resources Wales (NRW) - No Objection**
Natural Resources Wales raise no objection to the proposal. NRW reviewed the submitted Landscape and Visual Impact Assessment, Preliminary Ecological Appraisal, Green Infrastructure Statement and associated supporting information. NRW advise that whilst the site lies within a highly sensitive coastal landscape, the proposed mitigation and planting measures would help confine visibility to a localised area and the proposal is not considered likely to result in significant adverse landscape or visual effects. NRW further confirmed that the proposal is not likely to have a significant effect on nearby SAC designations and raised no concerns in relation to bats or protected species subject to implementation of the approved mitigation and enhancement measures.
- **PCNPA Ecologist - No Objection**
The Authority's Ecologist raises no objection to the proposal subject to conditions. The Ecologist reviewed the submitted Preliminary Ecological Appraisal, Green Infrastructure Statement, Ecological Enhancement Plan and planting proposals and confirmed that the submitted biodiversity enhancement strategy is acceptable in principle. Conditions were recommended requiring implementation of the approved ecological mitigation and enhancement measures together with revised siting details for bee hotels and hibernacula/log pile features to ensure these are located in suitable areas away from natural play spaces and high visitor activity areas.
- **County Highway Authority - No objection**
The County Highway Authority raises no objection to the proposal. It is noted that the site has operated as a seasonal campsite for a number of years utilising the existing access from the B4319 and that resurfacing and passing place improvements have previously been undertaken. The Highway Authority concluded that the proposal would not result in a material increase in traffic generation or unacceptable highway impacts given that the overall site occupancy and pitch numbers would remain unchanged. The Highway Authority also confirmed that sufficient cycle parking provision already exists on site.

- Public Rights of Way Officer - Conditional Consent
The Public Rights of Way Officer raises no objection to the proposal. It is noted that Public Bridleway SP6/1 adjoins the site boundary and an informative is recommended advising that the route must remain unobstructed and free from damage during the operation of the development.

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*.

One representation of support has been received which supports the proposal on the basis that:

- Gupton Farm has operated positively as a campsite for a number of years;
- the National Trust have engaged constructively with neighbouring residents regarding traffic management and signage issues;
- increased campervan provision may assist in reducing informal and unlawful overnight parking pressures at Freshwater West;
- the proposal would provide a more sustainable and managed alternative to overnight stays along the coastline;
- the proposed Landpods and campervan facilities are considered appropriate within the context of the existing campsite operation.

The representation also raises broader observations regarding visitor management at Freshwater West, parking enforcement and opportunities for renewable energy generation at Gupton Farm.

The matters raised have been noted and taken into consideration as part of the overall assessment of the application.

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)

Local Development Plan 2 (Adopted September 2020)

Within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also part of 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 09 (Light Pollution)
- 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 42 (Site Facilities on Tent, Chalet & Caravan Sites)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

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

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 5 – Nature Conservation and Planning
- TAN 12 – Design
- TAN 13 – Tourism
- TAN 18 – Transport
- TAN 23 – Economic Development
- TAN 24 – The Historic Environment
- TAN 15 – Development, flooding and coastal erosion (2025)

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](#)

- SPG - Biodiversity
- SPG - Landscape
- SPG - Seascapes
- SPG - Sustainable Design and Development
- SPG – Dark Skies
- SPG - Caravan Camping and Chalet

Constraints

- Landscape Character Area
- Special Area of Conservation - within 500m

- Special Protection Area - within 500m
- LDP Mineral Safeguard
- Ancient Monument - within 500m
- Recreation Character Areas
- Affordable Housing Submarkets

Officer's Appraisal

The application site relates to Gupton Farm Campsite, located within the open countryside approximately 1km north-west of Castlemartin and immediately north of the B4319 coastal road which connects Castlemartin with Freshwater West. The site lies within the Pembrokeshire Coast National Park and forms part of the wider National Trust landholding associated with Freshwater West and the Castlemartin Peninsula.

The site occupies a shallow valley landform within Landscape Character Area Castlemartin/Merrion Ranges (LCA6) an exposed coastal landscape characterised by rolling agricultural land, coastal grassland, military range land, dune systems and strong visual associations with the coast. The surrounding area is predominantly rural in character with agricultural fields bounded by hedgerows and scrub vegetation. To the south lies the Castlemartin military training range and permissive sections of the Wales Coast Path, whilst Freshwater West beach lies to the west. The wider landscape also includes distant views of industrial infrastructure associated with the Milford Haven Waterway including refinery chimneys, pylons and energy infrastructure visible in longer-distance views.

The application site itself currently operates as an established seasonal campsite under National Trust exemption arrangements and has done so for approximately 10 years. The existing site accommodates tent pitches and a limited number of campervans across three principal camping fields known as Fox Field, Furzy Field and Green Field. Existing facilities on site include a reception building, surf school facilities, bunkhouse accommodation, shower block, storage barn, parking areas, access tracks, water infrastructure and associated camping facilities.

The site is relatively enclosed by existing landform and vegetation, with the fields set within a shallow valley running broadly east-west. Access into the site is taken from the B4319 via an existing farm and campsite access track descending into the valley. Existing hedgerows, scrub vegetation, meadow areas and drainage features including reedbed treatment infrastructure are present throughout the site.

The surrounding area is environmentally sensitive and lies in proximity to several nationally and internationally designated ecological sites including the Pembrokeshire Marine SAC, Limestone Coast of South West Wales SAC, Castlemartin Coast SPA, Castlemartin Range SSSI, Castlemartin Corse SSSI and Broomhill Burrows SSSI.

The proposal seeks the formalisation and diversification of the existing camping operation through the change of use of land for camping, the seasonal siting of 5 Landpods, the seasonal siting of up to 20 campervans and installation of associated electrical hook-up points together with extensive landscape and biodiversity enhancements. The submitted information confirms that the proposal would diversify the existing tourism offer without materially increasing overall occupancy levels or pitch capacity at the site.

During the site inspection, it was observed that the site benefits from a degree of containment arising from the surrounding topography and existing vegetation structure. Whilst views into parts of the site are available from sections of the B4319 and adjacent permissive footpaths associated with the Wales Coast Path, longer-distance views are generally limited by landform, existing hedgerows and the recessed nature of the camping fields. The site also sits within an established tourism and recreation context associated with Freshwater West, the National Trust landholdings and the surrounding coastal access network.

1. Site and Proposed Development

The proposal comprises:

- Change of use of agricultural land to a seasonal camping and tourism use (approximate area of site 4.5 hectares not including existing track).
- Seasonal siting of 5 Landpods for holiday accommodation purposes.
- Seasonal siting of up to 20 campervans.
- Retention and reconfiguration of tent camping areas across Fox Field, Furzy Field and Green Field.
- Installation of 2 electrical hook-up points and associated infrastructure.
- Formation of recessed pod pitches set into existing landform with associated earth bunding.
- Native hedgerow planting and enhancement of existing field boundaries.
- Scrub mosaic planting and species-rich meadow creation.
- Biodiversity enhancement measures including habitat creation and ecological management areas.
- Retention and enhancement of existing drainage and reedbed treatment infrastructure.
- Retention and use of existing access arrangements, internal tracks and campsite facilities.
- Provision of informal recreation and amenity areas associated with the camping use.
- Seasonal operation of the site and removal/storage of pods outside the operational season.

2. Relevant Planning History

- NP/15/0403/FUL - Planning approval is sought for the demolition of the straw/implement building and hay shed, dairy and part milking parlour and conversion of remainder to activity base, conversion of cowshed to staff accommodation/interpretation/reception use, conversion of cart shed to holiday let, construction of toilet and shower block incorporating repairs to existing structure, conversion of farmhouse to bunkhouse, conversion of workshop to wet weather activity shed, erection of wet weather kitchen facility, erection of PV panels & solar thermal panels on roof, siting of ground mounted PV panels, siting of two storage containers, construction of car parking area, modification to site entrance, resurfacing of access track, creation of passing bays, installation of two new sewage treatment plants, landscaping & associated works - Approved 28/09/2015
- NP/15/0564/DOC - Discharge conditions 6, 9, 10 & 11 of NP/15/0403 - Partial Discharge 22/10/2015
- NP/16/0205/FUL - Erection of water storage tank - Approved 31/05/2016

- NP/16/0530/DOC - Discharge condition no. 10 of NP/15/0403/FUL - Discharged 11/10/2016
- NP/18/0257/DOC - Discharge condition 6 of NP/15/0403/FUL – Discharged 06/06/2018
- NP/18/0404/NMA - Non-material amendment to NP/15/0403/FUL – relocation of 2 storage containers - Approved 27/07/2018
- NP/19/0189/FUL - Creation of wetsuit drying area attached to existing Activity Centre - Approved 24/05/2019
- NP/19/0558/FUL - Change of Use from Agriculture to Activity Base (Retrospective) - Approved 13/01/2020
- NP/19/0696/FUL - Seasonal siting (May to September) of toilet and shower facilities for temporary three-year period - Approved 13/02/2020
- NP/20/0018/ADV - Visitor interpretation & Information for Gupton Farm – Approved 25/03/2020
- NP/24/0067/FUL - Installation of an Elsan point, tap and subsurface tank, including concrete surround and sub-base, connection of water supply and associated works – Approved 29/04/2024

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

3.1 Policy and Principle of Development:

102. 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).
103. 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) states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them. 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...'*
104. 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.

105. 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.
106. The application site lies within the countryside as defined by the Local Development Plan and within the Pembrokeshire Coast National Park. The proposal seeks the formalisation and diversification of an existing established seasonal camping operation at Gupton Farm through the seasonal siting of 5 Landpods, up to 20 campervans, associated electrical hook-up points and biodiversity enhancement works. The site has operated for approximately 10 years under National Trust exemption arrangements and already accommodates seasonal camping activity across Fox Field, Furzy Field and Green Field. With the site having an area of approximately 4.5 hectares it can be considered a large seasonal site under the definitions within Policy 41 of LDP2.
107. A significant material consideration in this case is the site's existing lawful operation under a National Trust camping exemption certificate issued pursuant to Section 269 of the Public Health Act 1936. Under this arrangement, Gupton Farm has historically operated as a seasonal exempted campsite without requiring express planning permission for the existing level of camping activity.
108. However, the current proposal seeks to move beyond the limitations of the exemption certificate regime through the provision of additional campervan pitches, glamping Landpods, associated infrastructure and a more formalised camping layout. The proposed scale and nature of the development would exceed the scope of the existing exempted site arrangements and therefore requires full planning permission.
109. Whilst the principle of seasonal camping activity is already established at the site, the transition from an exempted camping site to a fully consented tourism development means that, in planning terms, the proposal must be assessed as a new camping site under Policies 14 and 41 of LDP2.
110. Notwithstanding this, substantial weight is afforded to the longstanding established camping use of the site, the seasonal and reversible nature of the development, and the fact that the proposal seeks to formalise, regularise and environmentally enhance an existing tourism operation rather than introduce camping activity into a previously undeveloped landscape.
111. The principle of tourism-related development within the countryside is assessed principally against Policies 7, 38, 41 and 42 of LDP2. Policy 38 (Visitor Economy) supports sustainable visitor economy development where proposals are compatible with the special qualities of the National Park and would not result in unacceptable adverse impacts upon landscape character, biodiversity, amenity or highway safety. Policy 41 (Caravan, Camping and Chalet Development) seeks to carefully control camping and caravan development within the National Park, particularly within sensitive coastal landscapes and visually exposed locations.
112. The Caravan, Camping and Chalet SPG identifies Landscape Character Area 6 as having limited capacity for additional camping development, particularly at larger

scales, this proposal is a technical departure from Policy 41 as it proposes a large seasonal site in this location.

113. The Authority's pre-application advice acknowledged that the proposal, as originally conceived, conflicted in part with Policies 14 and 41 due to the scale and sensitivity of the site location. However, officers also advised that there may be scope to support a reduced-scale, clearly seasonal proposal where robust landscape mitigation, ecological enhancement and visitor management justification could be demonstrated.
114. The submitted application has sought to directly address those concerns through the submission of a comprehensive package of supporting information including a Landscape and Visual Impact Assessment, Green Infrastructure Statement, Ecological Enhancement Plan, planting proposals and operational justification. The proposal has been specifically designed as a seasonal and reversible form of development, with the Landpods removed from the site outside the operational season and stored within an existing onsite barn. This will be controlled by planning condition.
115. Importantly, the submitted information confirms that the proposal would diversify and reconfigure the existing tourism offer rather than materially increase overall occupancy levels or pitch capacity at the site. The proposal also seeks to support wider visitor management objectives associated with Freshwater West by providing managed campervan accommodation within an established tourism site.
116. The proposal incorporates significant landscape and biodiversity enhancement measures including native hedgerow planting, scrub habitat creation, species-rich meadow establishment and ecological management areas. NRW, the Authority's Ecologist and the Highway Authority raise no objection to the proposal subject to conditions.
117. Whilst there is a technical departure from Policy 41 and associated SPG guidance remains due to the sensitivity of the coastal landscape location, significant weight is afforded to:
 - the established camping use of the site;
 - the seasonal and reversible nature of the development;
 - the absence of any material increase in overall occupancy;
 - the substantial landscape and biodiversity enhancements proposed;
 - the tourism and visitor management benefits associated with the proposal;
 - the low-scale and landscape-led design approach adopted throughout the scheme.
118. On balance, it is considered that the proposal would not result in unacceptable harm to the special qualities of the National Park and that the material considerations in favour of the proposal outweigh the identified policy tensions in this instance. The principle of the development is therefore considered acceptable subject to appropriate planning conditions.

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

119. 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.
120. 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.
121. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
122. The application site lies within the open countryside of the Pembrokeshire Coast National Park and forms part of the wider National Trust landscape surrounding Freshwater West and the Castlemartin Peninsula. The site occupies a shallow valley landform within Landscape Character Area 6: Castlemartin/Merrion Ranges, a sensitive coastal landscape characterised by rolling agricultural land, coastal grassland, dune systems, military range land and strong visual associations with the coast.
123. A significant material consideration in this case is that the site currently operates as a lawful seasonal campsite under a National Trust exemption certificate issued pursuant to Section 269 of the Public Health Act 1936. The site has therefore accommodated seasonal camping activity for a number of years outside the formal planning regime. However, the current proposal seeks to move beyond the limitations of the exemption certificate system through the provision of additional campervan pitches, glamping Landpods, electrical hook-up points and a more formalised camping layout. As such, whilst the principle of camping activity is already established at the site, the proposal must be assessed in planning terms as a new camping site under Policies 14 and 41 of LDP2.
124. The special qualities of the National Park most relevant to the proposal include:
 - the diversity and quality of the landscape and coast;
 - remoteness, tranquillity and wildness;
 - richness of habitats and biodiversity;
 - accessibility and recreational opportunities;
 - the undeveloped and rural character of the coastline.
125. The application has been supported by a comprehensive Landscape and Visual Impact Assessment (LVIA) prepared by Chartered Landscape Architects in accordance with GLVIA3 methodology. The LVIA acknowledges the sensitivity of the landscape whilst concluding that the overall impact upon landscape character would be “minor beneficial” and that visual effects would be largely localised and limited to close-range views associated primarily with sections of the B4319 and nearby permissive footpaths.

126. The proposal has been specifically designed to integrate into the existing landscape through a landscape-led approach incorporating:
 - recessed siting of the Landpods into the existing slope;
 - earth bunding and landform modelling;
 - retention of existing vegetation and field patterns;
 - native hedgerow planting;
 - scrub mosaic planting;
 - species-rich meadow creation;
 - use of dark recessive materials and low-scale structures.
127. The submitted plans demonstrate that the majority of the development would be contained within the existing camping fields associated with the established campsite use. The LVIA confirms that wider visibility is restricted by the existing landform, hedgerows and the recessed nature of the site. The development would therefore be viewed within the context of an existing tourism and camping operation rather than as an isolated form of new development within an undeveloped coastal landscape.
128. Natural Resources Wales reviewed the submitted LVIA and raise no objection to the proposal. NRW acknowledge that the proposed mitigation and planting measures would help confine visibility to a localised area and advise that the development is not likely to result in significant adverse landscape or visual effects.
129. The proposal also incorporates substantial biodiversity and green infrastructure enhancements through the creation of native hedgerows, scrub habitat, meadow areas and ecological enhancement features. These measures are considered to positively contribute toward the special qualities of the National Park relating to biodiversity, habitat connectivity and landscape character.
130. The development is seasonal in nature, and the submitted information confirms that the landpods would be removed from the site outside the operational season and stored within an existing onsite barn. This reduces the permanence and long-term visual presence of the development within the landscape.
131. The site is not located within or adjacent to a Conservation Area and there are no Listed Buildings within the immediate application site. Whilst Scheduled Monuments, Listed Buildings and designated historic assets exist within the wider landscape surrounding Castlemartin and Freshwater West, it is recognised that setting is a broad concept extending beyond visual considerations alone and may include experiential and sensory factors such as tranquillity, activity, movement, noise and the wider character of the surrounding landscape.
132. In this instance, the proposal relates to the diversification and formalisation of an existing established seasonal camping site and would remain closely associated with the existing tourism and recreational character of the area surrounding Freshwater West. The development would be seasonal, relatively low-scale and integrated within the existing landform and vegetation structure. The proposal is not considered likely to introduce sensory, visual or experiential impacts of a scale or nature that would result in unacceptable harm to the setting, character or significance of nearby historic assets or the wider historic landscape of the National Park.

133. Having regard to the submitted plans and supporting information, the proposal is considered to represent an appropriately sited and designed form of low-impact seasonal tourism development which would not result in unacceptable harm to the special qualities, landscape character or visual amenity of the Pembrokeshire Coast National Park. Subject to the imposition of conditions relating to landscaping, biodiversity enhancement, lighting and seasonal operation, the proposal is considered compliant with Policies 8, 14 and 29 of LDP2.

3.3 Amenity and Privacy:

134. 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.
135. The application site is located within a rural area associated with the existing Gupton Farm camping operation and wider recreational uses linked to Freshwater West and the National Trust estate. The nearest neighbouring residential properties are limited in number and separated from the main camping areas by intervening landform, vegetation, agricultural fields and existing access routes. The site has also historically operated as a seasonal campsite under an exemption certificate arrangement and therefore the surrounding area already experiences an established level of seasonal tourism and recreational activity.
136. The proposal seeks to formalise and diversify the existing camping use rather than introduce an entirely new land use into the area. Importantly, the submitted information confirms that the proposal would not materially increase the overall occupancy levels or pitch capacity at the site but instead redistribute and diversify the accommodation offer through the provision of campervan pitches and seasonal Landpods.
137. Given the scale, seasonal nature and rural context of the proposal, it is not considered likely that the development would give rise to unacceptable impacts in terms of noise, disturbance, overlooking, loss of privacy or general amenity. The proposed Landpods are modest in scale and would be recessed into the landscape, whilst the camping and campervan areas would remain associated with the existing established campsite fields.
138. The proposal includes significant landscape mitigation and biodiversity enhancement measures including earth bunding, native hedgerow planting, scrub planting and

meadow creation which would assist in softening views of the development and reducing any potential visual intrusion.

139. The development would continue to utilise the existing access arrangements and campsite infrastructure at Gupton Farm and the Highway Authority has raised no objection to the proposal, concluding that the proposal would not result in a material increase in traffic generation or unacceptable highway impacts.
140. Subject to conditions relating to lighting, seasonal operation and implementation of the approved landscaping and ecological mitigation measures, the proposal is not considered likely to result in unacceptable adverse impacts upon the amenity of neighbouring occupiers, visitors to the National Park or the wider rural character of the area. The proposal is therefore considered compliant with Policy 30 of LDP2.

3.4 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity impacts

141. PPW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 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.
142. The submitted Ecological Enhancement Plan includes habitat enhancement measures such as bee hotels, hibernacula/log piles and associated biodiversity features intended to contribute toward habitat diversity and ecological resilience across the site.
143. The Authority's Ecologist initially requested amended details in relation to the siting of certain ecological enhancement features to ensure they were positioned away from natural play areas and locations of higher visitor activity. Following discussions with the applicant and National Trust representatives, it has been agreed that revised siting details for these features can appropriately be secured through planning condition.
144. The Authority's Ecologist has confirmed that this approach is acceptable subject to the ecological enhancement features being relocated to more suitable positions within the site. The final siting and implementation of bee hotels, hibernacula/log piles and associated habitat features will therefore be secured through an appropriately worded planning condition requiring submission, approval and implementation within an agreed timeframe following commencement of development.
145. This approach is considered reasonable and proportionate having regard to the wider biodiversity enhancement strategy proposed across the site, including native hedgerow planting, scrub habitat creation, species-rich meadow establishment and ecological connectivity improvements.

Net Benefit for Biodiversity and Green Infrastructure

146. 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 and that overall, there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced wellbeing.
147. 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.
148. 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.
149. The application has been supported by a Green Infrastructure Statement, Ecological Enhancement Plan and detailed planting strategy which together demonstrate a landscape-led and stepwise approach to the design of the development in accordance with Planning Policy Wales 12. The submitted information shows that the proposal has sought to retain and enhance existing landscape features wherever possible, incorporating biodiversity enhancement and ecological connectivity measures throughout the site design rather than relying upon standalone mitigation.
150. The proposed landscaping and ecological enhancement measures include:
 - native species-rich hedgerow planting;
 - scrub mosaic habitat creation;
 - species-rich meadow establishment;
 - wetland meadow enhancement;
 - retention and strengthening of existing field boundaries;
 - ecological connectivity corridors;
 - habitat enhancement features including bee hotels and hibernacula/log piles.
151. The proposed landscaping strategy is considered appropriate to the character of the Pembrokeshire Coast National Park and avoids the introduction of engineered or suburban boundary treatments. Instead, the proposals utilise native planting, meadow creation and traditional landscape features which would assist in integrating the development into the surrounding landscape whilst also delivering biodiversity enhancement.
152. The Authority's Ecologist and Natural Resources Wales have both reviewed the submitted Green Infrastructure and ecological information and raise no objection to the proposal subject to conditions requiring implementation and ongoing management of the approved mitigation and enhancement measures.
153. The Authority is satisfied that the proposal demonstrates an overall net benefit for biodiversity and ecosystem resilience through the delivery of substantial habitat

enhancement, improved ecological connectivity and landscape restoration measures across the site. The proposal is therefore considered compliant with the requirements of Planning Policy Wales 12, Section 6 of the Environment (Wales) Act 2016 and Policies 10 and 11 of LDP2.

Protected Sites

Sites of Special Scientific Interest (SSSI)

154. The *Wildlife and Countryside Act 1981 (as amended)* places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a Site of Special Scientific Interest (SSSI), to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.
155. Additionally, Paragraphs 6.4.25 & 6.4.26 of PPW12 relate to developments in or in close proximity to Sites of Special Scientific Interest (SSSI), with 6.4.26 stating that
156. *'There is a presumption against development not within a SSSI but likely to damage SSSI. In such cases, proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are carefully understood, and development should be refused where there are adverse impacts on the features for which the site has been designated. International and national responsibilities and obligations for conservation should be fully met, and consistent with the objectives of the designation, statutorily designated sites should be protected from damage and deterioration, with their important features conserved and enhanced and the capacity for restoration demonstrated by and through appropriate management.'*
157. The application site lies in proximity to a number of nationally designated ecological sites including Castlemartin Range SSSI, Castlemartin Corse SSSI and Broomhill Burrows SSSI. Given the ecological sensitivity of the surrounding landscape, both Natural Resources Wales and the Authority's Ecologist were consulted on the application.
158. Natural Resources Wales reviewed the submitted Preliminary Ecological Appraisal, Green Infrastructure Statement, Ecological Enhancement Plan and supporting landscape information and raise no objection to the proposal. NRW advise that the proposal is not likely to result in significant adverse impacts upon the nearby SSSI designations subject to implementation of the approved mitigation, landscaping and ecological enhancement measures.
159. The Authority's Ecologist similarly raises no objection to the proposal subject to conditions requiring implementation and long-term management of the approved biodiversity enhancement and habitat creation measures.

Habitat Regulations Assessment

160. SACs and SPAs are of European importance. Under the *Conservation of Habitats and Species Regulations (2017)* (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions.

161. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are internationally designated sites afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended). The application site lies in proximity to the Pembrokeshire Marine SAC and Castlemartin Coast SPA.
162. Natural Resources Wales confirmed that the proposal is not likely to have a significant effect on the designated features of the nearby SAC or SPA and raised no objection in relation to Habitats Regulations matters. Having regard to the submitted ecological information, the use of existing drainage infrastructure, the proposed mitigation and enhancement measures, and the absence of any significant increase in overall occupancy levels at the site, the Authority concludes that the proposal would not be likely to have a significant effect upon the Pembrokeshire Marine SAC or Castlemartin Coast SPA either alone or in combination with other plans or projects.
163. Having regard to the submitted ecological assessments, Green Infrastructure Statement, consultation responses and proposed biodiversity enhancement measures, the proposal is considered compliant with Policies 10 and 11 of LDP2 together with the requirements of Planning Policy Wales 12, the Environment (Wales) Act 2016, the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Subject to conditions securing implementation of the approved mitigation, landscaping and ecological enhancement measures, the proposal is considered acceptable in ecological terms.

3.7 Access and Parking

164. 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.
165. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
166. The application site is accessed via an existing vehicular access from the B4319 which currently serves Gupton Farm, the established campsite operation and associated tourism use links to Freshwater West. The proposal would continue to utilise the existing access arrangements, internal tracks and parking areas associated with the existing camping operation.
167. The submitted information confirms that the proposal seeks to diversify and formalise the existing camping operation rather than materially increase overall site occupancy or pitch numbers. The development would therefore represent a redistribution of accommodation types through increased campervan provision and seasonal Landpods rather than a significant intensification of the existing tourism use.
168. The County Highway Authority was consulted on the proposal and raises no objection. The Highway Authority notes that:
 - the site has operated as a campsite for a number of years;
 - the existing access arrangements are considered adequate;

- resurfacing and passing place improvements have already been undertaken;
- the proposal would not result in a material increase in traffic generation or unacceptable highway impacts.

169. The Highway Authority further confirmed that sufficient cycle parking provision already exists on site in proximity to the reception area and therefore no additional cycle parking requirements are considered necessary.
170. The site occupies a sustainable tourism location associated with the established recreational destination at Freshwater West and benefits from direct access to the surrounding walking, cycling and coastal access network, including nearby sections of the Wales Coast Path and associated permissive routes. There is also an established bus route to Angle that passes the entrance to the site.
171. The Public Rights of Way Officer also raises no objection to the proposal subject to an informative advising that Public Bridleway SP6/1 adjoining the site must remain unobstructed and free from damage during the operation of the development.
172. Having regard to the existing established use of the site, the consultation responses received and the scale and nature of the proposal, the development is not considered likely to result in unacceptable impacts upon highway safety, access arrangements or the wider transport network. The proposal is therefore considered compliant with Policies 59 and 60 of LDP2.

3.8 Surface and foul water drainage:

173. 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.
174. The application site currently operates as an established seasonal campsite and benefits from existing drainage infrastructure including an onsite sewage treatment and reedbed filtration system serving the existing camping facilities. The submitted information confirms that the proposal will not result in an increase in occupation that is currently taking place, and this will be conditioned controlling the number of pitches. The proposal would also continue to utilise the existing drainage arrangements and does not propose substantial new areas of hardstanding or engineered surfacing.
175. The proposal has been designed as a low-impact and largely permeable form of development incorporating grassed camping areas, limited hard surfacing, recessed pod siting and extensive landscape planting. The submitted Green Infrastructure Statement and landscape proposals demonstrate an integrated approach toward water management, biodiversity enhancement and landscape mitigation through the use of meadow planting, retained vegetation, scrub planting and existing drainage features.
176. The development is not considered likely to result in unacceptable increases in surface water runoff or flood risk and the use of permeable surfaces and existing drainage infrastructure is considered appropriate having regard to the scale and seasonal

nature of the proposal. The proposed landscaping and ecological enhancement measures would also assist in slowing surface water flows and improving site permeability.

177. Having regard to the submitted information, the scale and nature of the development and the absence of objections from relevant consultees, the proposal is considered compliant with Policy 32 of LDP2 and the principles of TAN 15 in respect of sustainable drainage and minimising adverse environmental impacts.

4. Conclusion

178. The application seeks full planning permission for the formalisation and diversification of an existing seasonal camping operation at Gupton Farm through the change of use of land for camping, the seasonal siting of five landpods, up to 20 campervans, associated electrical hook-up provision and extensive landscape and biodiversity enhancement works. The proposal has been supported by a comprehensive package of information including a Landscape and Visual Impact Assessment, Green Infrastructure Statement, Ecological Enhancement Plan, planting proposals and operational justification.
179. A significant material consideration in this case is that the site has historically operated as a lawful seasonal campsite under a National Trust exemption certificate. Whilst the proposal must be assessed in planning terms as a new camping site due to the proposed scale and formalisation of the development, substantial weight is afforded to the established tourism use of the site, the seasonal and reversible nature of the development and the fact that the proposal seeks to regularise and environmentally enhance an existing tourism operation rather than introduce camping activity into a previously undeveloped landscape.
180. The proposal has been specifically designed to integrate into the landscape through recessed pod siting, earth bunding, native hedgerow planting, scrub habitat creation, species-rich meadow establishment and retention of existing vegetation and landform features. The submitted LVIA concludes that the proposal would result in only localised visual impacts and an overall “minor beneficial” effect upon landscape character. NRW, the Authority’s Ecologist and the Highway Authority all raise no objection to the proposal subject to conditions.
181. The proposal would deliver significant biodiversity and green infrastructure enhancements in accordance with Planning Policy Wales 12 and Section 6 of the Environment (Wales) Act 2016, whilst also contributing toward sustainable tourism and visitor management objectives associated with Freshwater West and the wider National Trust estate.
182. Whilst the proposal is a departure from Policy 41, and the Caravan Camping and Chalet SPG, it is considered that the proposal has satisfactorily demonstrated that the development would not result in unacceptable harm to the special qualities, landscape character, biodiversity interests or amenity of the Pembrokeshire Coast National Park. The material considerations in favour of the proposal are therefore considered to outweigh the identified policy concerns in this instance.

183. Having regard to the above, the proposal is considered compliant with the relevant policies of Future Wales, Planning Policy Wales 12 and the Pembrokeshire Coast National Park Local Development Plan 2 and is recommended for approval subject to conditions.
184. In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. Recommendation

Delegate approval to officers following the end of the public advertisement period for a policy departure, subject to the following conditions:

1. The development shall begin no later than five years from the date of this decision.
Reason: Required to be imposed pursuant to Section 91 (1) of the *Town and Country Planning Act 1990* (as amended).
2. The development shall be carried out in accordance with the following approved plans and documents:
 - Site Location Plan 1 2500 (476-LST-XX-XX-DR-L-0001-Location Plan)
 - Site Location Plan 1 500 (476-LST-XX-XX-DR-L-0002-1_500 Location Plan)
 - Landscape Design Masterplan (476-LST-XX-XX-DR-L-0101-Concept Landscape Masterplan-P04)
 - Site Masterplan1 500 (476-LST-XX-XX-DR-L-0103-1_500 Masterplan-P02)
 - Existing Plan (476-LST-XX-XX-DR-L-0104-Existing Plan-P01)
 - Planting Plan (476-LST-XX-XX-DR-L-0301-Planting Plan -P03)
 - Ecological Enhancement Proposals Plan (476-LST-XX-XX-DR-L-0302-Proposed Ecological Enhancements Plan)
 - Issue Sheet (26 03 19 476 Gupton Farm Issue Sheet)
 - Electrical Hook up layout proposed (TT1F-2F-3F 16A Unmetered Connection Unit Datasheet 05.05.22)
 - LandPod Woodland Lodge proposed (CAD-The Woodland Lodge-CAD (1))
 - Planning Design and Access Statement
 - Landscape and Visual Impact Assessment (476-LST-XX-XX-RP-L-0003 LVIA P02)
 - Landscape Design Workbook (476-LST-XX-XX-RP-L-0001 Design Workbook P04) Green Infrastructure Statement (GIS 476-LST-XX-XX-RP-L-0002 Green Infrastructure Statement) (GIS)
 - Preliminary Ecological Appraisal (PEA 260108 476 Gupton Farm PEA)
 - Gupton Pre Application Consultation Report (Gupton camping 2026 consultation report final)

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special

Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. In the first available planting season following approval, planting must be implemented according to the Green Infrastructure Statement (Proposed Ecological Enhancements Plans, Planting Plan P03, Concept Landscape Masterplan P04). Any existing plants retained; or new plants planted in accordance with the approved scheme which, within a period of 5 years after implementation of the approved development are removed, die, become diseased or damaged to such extent that, in the opinion of the Local Planning Authority, the function in relation to this planning approval is no longer delivered, shall be replaced with plants of similar size and specification. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by the LPA.
Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders (1997)
4. Prior to the erection of any additional external lighting on the approved site a light mitigation strategy, including measures to reduce light spillage onto foraging habitats for bats shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 12 (Local Areas of Nature Conservation or Sites of Geological Interest) and 14 (Conservation of the Pembrokeshire Coast National Park).
5. The development shall be implemented in accordance with the recommendations contained within Section 7 of the Preliminary Ecological Appraisal dated January 2026. Any variation to the recommendations must be submitted to and approved by the local planning authority before such a variation is made.
Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2017 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species) and 14 (Conservation of the Pembrokeshire Coast National Park). Section 6 of PPW edition 12.
6. Within 12 months of the date of this permission, revised details for the siting and specification of the approved bee hotels, hibernacula/log piles and associated ecological enhancement features shall be submitted to and approved in writing by the Local Planning Authority. The approved features shall thereafter be implemented in full within the first available planting season following approval and retained thereafter.

Reason: To secure biodiversity enhancement and habitat resilience in accordance with Policies 8, 10 and 11 of the Local Development Plan and Section 6 of the Environment (Wales) Act 2016.”

7. Planning permission is granted for the use of the land as a seasonal campsite comprising no more than 50 camping pitches, limited to the months of March to November inclusive, after which time no camping use or associated storage will take place on the land.

Reason: To enable the Local Planning Authority to periodically review the impact of the seasonal campsite use. Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), and 14 (Conservation of the Pembrokeshire Coast National Park).

8. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development Order) 1995 (as amended) no other camping or caravanning use otherwise approved by Class B of Part 4, Class A of Part 5, and Class B of part 5 of Schedule 2 to the Order, shall be carried out without express planning permission first having been granted.

Reason: To ensure that no other form of temporary camping or caravan use takes place on the site. Local Development Plan 2 – Policies 38 (Visitor Economy) and Policy 41 (Caravan, Camping and Chalet Development).

6. Informatives

Rights of Way

- The proposed development would abut a public right of way, Public Bridleway SP6/1
- The public rights of way must not be obstructed.
- There must be no diminution to the width of the public right of way.
- No damage is to be caused to the surface of the public rights of way
- No additional barriers to be placed on the public rights of way, either of a temporary or permanent nature.