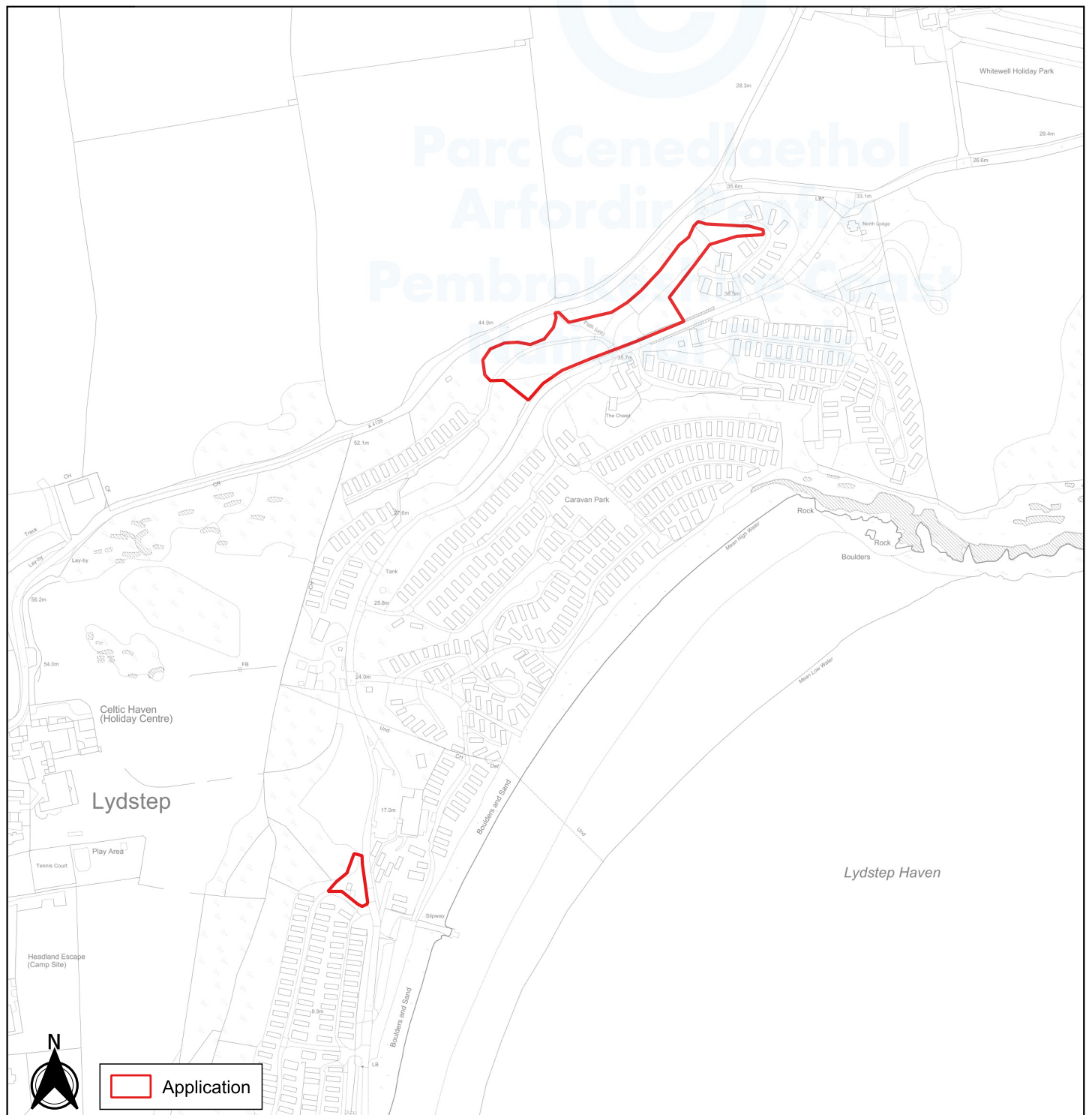
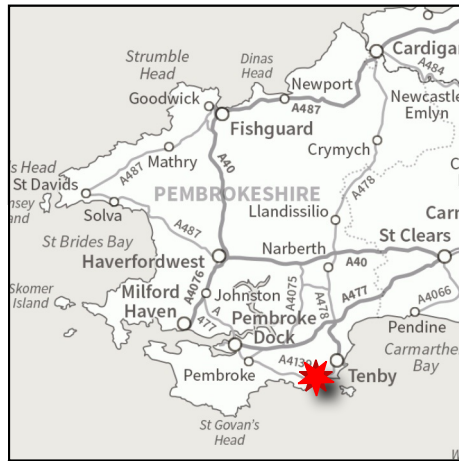




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:5,000



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

PLANNING COMMITTEE REPORT



Ref No: NP/25/0156/FUL

Proposal: Installation of 12 bases for the siting of holiday accommodation (which fall under the definition of a caravan) and decking, with associated access, landscaping and infrastructure works.

Site Location: Lydstep Beach Village, Lydstep Haven, Tenby, Pembrokeshire, SA70 7SB

Recommendation: **Approve**, subject to conditions

The application is presented to the Development Management Committee in accordance with the scheme of delegation as the proposed development does not accord with the provisions of the adopted Local Development Plan 2. In addition, both Community Councils object to the application and Natural Resources Wales object to landscape impacts.

Link to application supporting details: [Citizen Portal Planning - application details](#)

Summary

The application site comprises two parcels of land within the established Lydstep Beach Village holiday park at Lydstep Haven, approximately 3 kilometres south-west of Tenby, within the Pembrokeshire Coast National Park. Lydstep Beach Village is a long-established holiday park providing approximately 471 holiday accommodation units together with associated internal roads, leisure facilities, landscaping and open space. The site occupies a prominent coastal location overlooking Lydstep Bay. It is situated in proximity to the Limestone Coast of Southwest Wales Special Area of Conservation (SAC) and the Lydstep and Tenby Burrows Site of Special Scientific Interest (SSSI).

Planning permission is sought for the installation of 12 bases for the siting of holiday accommodation units (falling within the definition of a caravan), together with associated decking, internal access roads, parking, landscaping and drainage infrastructure. Eleven units are proposed within the South of Pine Tree area and one unit within the North of Haven Crest area. The proposal represents a modest infill development within the existing operational holiday park and does not extend the established site boundary into the surrounding countryside.

The application is supported by a comprehensive suite of technical documents, including a Planning Statement, Landscape and Visual Impact Assessment, Ecological Impact Assessment, Green Infrastructure Statement, Arboricultural Impact Assessment, Bat Conservation Plan, Construction Environmental Management Plan and Lighting Strategy. These documents conclude that, subject to the implementation of the proposed mitigation and enhancement measures, the development would not give rise to unacceptable impacts on the landscape, biodiversity, highway safety, residential amenity or the special qualities of the Pembrokeshire Coast National Park.

Having regard to the Development Plan, national planning policy, consultation responses and all other material considerations, Officers consider that the proposal represents an

appropriate form of tourism development within an established holiday park and recommend that planning permission be granted subject to appropriate conditions.

Consultee Response

- Natural Resources Wales (NRW): Concerns raised
Initially raised concerns regarding the submitted Landscape and Visual Impact Assessment and Ecological Impact Assessment, advising that insufficient information had been provided to conclude that the proposal would not adversely affect the Limestone Coast of South West Wales SAC and associated protected species. Following the submission of a Bat Conservation Plan and Construction Environmental Management Plan (Biodiversity). Following additional information submitted, NRW maintained concerns regarding landscape impacts.
- Pembrokeshire Coast National Park Authority Principal Planning Officer (Environment): No Objection, subject to conditions
Reviewed the submitted Arboricultural Impact Assessment, Arboricultural Method Statement, Green Infrastructure Statement and Landscape proposals. Did not object, subject to conditions requiring tree protection measures, implementation of the approved landscaping scheme, long-term landscape management, arboricultural supervision, biodiversity enhancements, amendments to Construction Exclusion Zone fencing and the incorporation of traditional Pembrokeshire hedgebanks where appropriate. The Officer concluded that the proposal was acceptable in relation to the immediate tree and landscape constraints.
- Pembrokeshire County Council Highway Authority: No Objection
No objection was raised to the proposal. The Highway Authority considered the existing vehicular access and internal road layout to be satisfactory and capable of accommodating the modest increase in traffic associated with the proposed development.
- Pembrokeshire County Council Civil Engineering (SAB): No Objection
Confirmed that the submitted drainage strategy, which proposes disposal of surface water via soakaways, is acceptable in principle and can form the basis of a future Sustainable Drainage Approval Body (SAB) application. Advised that separate SAB approval will be required before the commencement of development in accordance with Schedule 3 of the Flood and Water Management Act 2010.
- Pembrokeshire Coast National Park Authority Public Rights of Way: No Objection
Confirmed that Public Footpath SP33/22 passes through part of the application site but did not object as the development has been designed to accommodate the route. Requested that an informative be attached to any planning permission requiring the public right of way to remain unobstructed throughout construction and operation, with no reduction in width or accessibility.
- Manorbier Community Council: Objection (No Planning Reasons Given)
Following consideration of the application, Manorbier Community Council voted not to support the proposal. No planning reasons or specific grounds of objection were provided.

- Penally Community Council: Objection
Objected to the proposal on the grounds of alleged non-adherence to the planning application process. No further explanation or planning justification accompanied the objection.

Public Response

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

Four letters of objection have been received raising the following concerns:

- The applicant did not undertake consultation with existing holiday homeowners before submitting the application.
- The proposed siting of Unit 11 within the Pine Tree area would result in the loss of an existing area of informal open green space used for recreation and children's play.
- The development would diminish the spacious, peaceful and secluded character of the Pine Tree cul-de-sac.
- The proposal would adversely affect the amenity of existing occupiers through increased activity, traffic, noise and artificial lighting.
- The proposed location of Unit 11 would result in a loss of privacy for the occupiers of nearby holiday units, due to the orientation of the proposed decking and holiday accommodation.
- Concern that the development would adversely affect existing wildlife and habitats within the Pine Tree area, including birds, squirrels, foxes, rabbits and badgers.
- Comment that Unit 11 could be relocated within the South of Pine Tree development area to avoid the loss of open space and reduce impacts on existing occupiers.
- Concern that existing infrastructure and facilities within the holiday park may be insufficient to accommodate additional holiday units.
- Concern regarding the future storage location of caravans, boats and other equipment currently stored within the South of Pine Tree area.

Officer Response

The concerns raised have been carefully considered.

The proposed development has been assessed against the relevant policies of the Development Plan, including Policies 1, 8, 14, 29, 30 and 41 of LDP2, together with the submitted Landscape and Visual Impact Assessment, Ecological Impact Assessment, Green Infrastructure Statement and Arboricultural Impact Assessment.

Whilst the proposal will result in the loss of an informal grassed area within the Pine Tree area, Officers consider that the development has been carefully designed as a modest infill addition within an established holiday park and would not result in unacceptable harm to the overall character or operation of the site. The existing site already has three formal open space/play areas which total 0.768 acres and many other informal open grassed areas which are located throughout the park which serve as play spaces and give the site it's rural character. The planning application has been supported by landscape and ecological

assessments which conclude that, subject to the proposed mitigation and landscaping, the proposal would not give rise to significant adverse effects.

In terms of amenity, the proposed holiday accommodation would be located within an established holiday park where units are already arranged around communal spaces and internal roads. Although there will be changes to the outlook from neighbouring holiday units, the proposed separation distances and layout are not considered to result in unacceptable overlooking, loss of privacy or overbearing impacts when viewed in the context of this established holiday park setting.

Concerning biodiversity, the Ecological Impact Assessment, Bat Conservation Plan and Green Infrastructure Statement have informed the design of the proposal. Existing woodland, mature trees and hedgerows are to be retained where possible, with additional habitat creation and native planting proposed. While objectors refer to wildlife, including badgers and other mammals, no evidence has been submitted to demonstrate that the proposal would adversely affect protected species beyond those assessed within the ecological reports. Ecological mitigation and biodiversity enhancement measures will be secured by planning condition.

The suggestion that Unit 11 could be relocated elsewhere within the site has been noted. However, that does not form a part of the current proposed scheme, and the submitted planning application has been assessed on its own merits. The applicant's Landscape and Visual Impact Assessment explains that the proposed layout has evolved through consideration of landscape, arboricultural and ecological constraints, and Officers are satisfied that the proposed siting is acceptable.

Finally, matters relating to pre-application consultation by the applicant, the commercial operation of the holiday park and the adequacy of utility infrastructure are either not material planning considerations or would not warrant refusal of planning permission. Accordingly, whilst the objections are acknowledged, they do not provide any reasons that would, on balance, result in a recommendation of refusal of the planning 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 applying to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 09 (Light Pollution)
- Policy 10 (Sites and Species of European Importance)
- 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 40 (Self-Catering Development)
- Policy 41 (Caravan, Camping and Chalet Development)
- Policy 55 (Infrastructure Requirements)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of the 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 05 – Nature Conservation and Planning
- TAN 10 – Tree Preservation Orders
- TAN 11 - Noise
- TAN 12 – Design
- TAN 13 – Tourism
- TAN 14 – Coastal Planning
- TAN 15 – Development, Flooding and Coastal Erosion
- TAN 16 – Sport, Recreation and Open Space
- TAN 18 – Transport
- TAN 23 – Economic Development
- 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](#).

- Caravan and Camping SPG – *assessment of an extension to an existing holiday park under Policy 41*.
- Landscape Character SPG – *LCA 4: Manorbier/Freshwater East*.
- Seascape Character SPG – *SCA 38: Lydstep Haven Coastal Waters*.
- Biodiversity SPG – *SAC, SSSI, protected species and net benefit for biodiversity*.
- Trees and Woodland SPG – *retention and protection of mature trees and woodland*.

- Planning for the Conservation and Enhancement of Dark Skies in Wales SPG – *the submitted lighting strategy is an important mitigation measure for greater horseshoe bats and maintaining dark corridors.*
- Sustainable Design and Development SPG – *landscape-led design, Green Infrastructure and integration of the development into the National Park.*
- Parking Guidelines SPG – *internal parking provision and layout.*
- Archaeology SPG – *Ancient monuments are located near the site.*

Constraints

- Seascape Character Areas- *Lydstep Haven Coastal Waters*
- Landscape Character Area - *Manorbier/Freshwater East*
- Technical Advice Note 15_c2-
- Special Area of Conservation - within 500m- *Limestone Coast of South West Wales*
- Site of Special Scientific Interest - within 50m- *Lydstep and Tenby Burrows*
- Tree Preservation Order
- Heritage Coast - within 100m
- LDP Open Space
- Biodiversity Issue
- Historic Landscape (*Manorbier*)
- Safeguarding Zone
- Rights of Way Inland - within 50m (*Public Footpath SP33/22*)
- Ancient Monument - within 500m
- Regionally Important Geological Sites
- Hazardous Zones
- ROW Coast Path - within 10m

Officer's Appraisal

Lydstep Beach Village is an established holiday park located on the southern coast of the Pembrokeshire Coast National Park at Lydstep Haven, approximately 3 kilometres south-west of Tenby. The site occupies a prominent coastal location overlooking Lydstep Bay and has operated as a holiday park for several decades. It currently comprises approximately 471 holiday accommodation pitches, together with associated internal estate roads, parking areas, reception facilities, leisure buildings, landscaping and open amenity areas. The park is accessed from the A4139 via an existing priority junction.

The application relates to two separate infill parcels within the existing operational holiday park. The larger area, known as South of Pine Tree, is located towards the northern extent of the site and currently comprises open grassed amenity space situated between existing holiday accommodation, mature woodland edge and internal estate roads. The area is enclosed by established trees, hedgerows and scrub, with the woodland along the northern boundary providing an established landscape backdrop. The second area, known as North of Haven Crest, is located within the southern section of the park close to the coastline and consists of a small area of open land adjacent to existing holiday accommodation and internal access roads.

The wider site lies within the designated Pembrokeshire Coast National Park where the primary statutory purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. The Pembrokeshire Coast Path National Trail passes through the holiday park, whilst the coastline immediately to the south forms part of the Limestone Coast of South West Wales Special Area of Conservation (SAC) and the Lydstep Head to Tenby Burrows Site of Special Scientific Interest (SSSI). The surrounding landscape comprises coastal cliffs, woodland, agricultural land and the wider holiday park development. The application site therefore occupies a sensitive environmental setting where landscape, biodiversity and visual considerations are of particular importance.

Planning permission is sought for the installation of 12 bases for holiday accommodation (falling within the definition of a caravan), together with associated decking, internal access roads, parking areas, drainage infrastructure and landscaping works. Eleven bases are proposed within the South of Pine Tree area, whilst a single base is proposed within the North of Haven Crest area. The proposals have been designed as infill development within the existing holiday park rather than an extension beyond its established boundaries.

A comprehensive package of supporting information accompanies the application, including a Planning Statement, Landscape and Visual Impact Assessment, Green Infrastructure Statement, Ecological Impact Assessment, Arboricultural Impact Assessment and Method Statement, Bat Conservation Plan, Construction Environmental Management Plan and Exterior Lighting Strategy. Collectively, these documents seek to demonstrate that the proposals have been informed by landscape character, arboricultural constraints, ecological considerations and biodiversity enhancement opportunities.

1. Site and Proposed development

The proposal comprises:

- Installation of 12 bases for the siting of holiday accommodation (falling within the definition of a caravan).
- Provision of 11 holiday accommodation bases within the South of Pine Tree area of the existing holiday park.
- Provision of 1 holiday accommodation base within the North of Haven Crest area.
- Construction of associated timber decking to serve the proposed holiday accommodation.
- Formation of new internal estate roads, access arrangements and pedestrian footways.
- Provision of 22 parking spaces to serve the proposed accommodation.
- Installation of associated surface water drainage and other infrastructure.
- Implementation of a comprehensive landscaping and Green Infrastructure scheme, including native tree, hedgerow and scrub planting.
- Ecological mitigation and biodiversity enhancement measures, including an Ecological Enhancement Area, Bat Conservation Plan, Construction Environmental Management Plan (CEMP) and sensitive lighting strategy.
- Tree protection measures and implementation of the submitted Arboricultural Method Statement during construction.

2. Relevant Planning History

- No recent relevant planning history has been identified within this site for these two areas.

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:

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) 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...*'.
3. 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.
4. Future Wales recognises the importance of supporting sustainable rural communities and tourism whilst respecting the statutory purposes of National Parks. It acknowledges that National Park Authorities have a unique role in conserving and enhancing natural beauty, wildlife and cultural heritage whilst fostering the economic and social well-being of local communities where compatible with those statutory purposes.
5. Planning Policy Wales (Edition 12) promotes sustainable tourism development that supports the economy whilst protecting environmental assets. It recognises that tourism is an important part of the Welsh economy and encourages the improvement

and upgrading of existing tourism facilities where proposals are appropriately located, well designed and do not result in unacceptable impacts on landscape, biodiversity or local amenity.

6. The application site forms part of the long-established Lydstep Beach Village, an existing holiday park located within the National Park. The proposal seeks permission for the installation of 12 additional holiday accommodation bases within two infill areas wholly contained within the existing operational site. The proposal does not extend the external boundary of the holiday park into open countryside but instead utilises areas of managed land located between existing holiday accommodation and established landscaping.
7. The proposal has therefore been assessed against the relevant policies of LDP2, including 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 of the Pembrokeshire Coast National Park), Policy 29 (Sustainable Design), Policy 30 (Amenity), Policy 32 (Surface Water Drainage), Policy 38 (Visitor Economy), Policy 40 (Self-Catering Development), Policy 41 (Caravan, Camping and Chalet Development), Policy 55 (Infrastructure Requirements), Policy 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).
8. Policy 38 seeks to support a sustainable visitor economy by maintaining an appropriate range of visitor accommodation whilst ensuring that the National Park's special qualities are conserved and enhanced. The supporting strategy makes clear that additional visitor accommodation should be carefully managed to avoid unacceptable cumulative impacts upon the landscape and environmental qualities of the National Park.
9. More specifically, Policy 41 – Caravan, Camping and Chalet Development provides the principal policy framework for proposals involving additional caravan accommodation. The policy supports proposals where they are of an appropriate scale, are sensitively sited and designed, conserve and enhance the National Park landscape, avoid unacceptable impacts on biodiversity, residential amenity and highway safety, and are supported by appropriate landscaping and mitigation measures. The policy supports extensions to existing sites where the extension is in a well-screened location.
10. In this case, the proposal represents a relatively modest increase of 12 holiday accommodation units within an established holiday park of approximately 471 pitches. The proposed accommodation is concentrated within two infill locations that have been selected following detailed landscape, ecological and arboricultural assessments. The development has been designed to retain existing woodland, hedgerows and mature vegetation whilst incorporating additional planting and Green Infrastructure enhancements to reinforce the site's landscape framework. Comprehensive ecological mitigation, including a Bat Conservation Plan, sensitive lighting strategy, biodiversity enhancements and Construction Environmental Management Plan, has also been submitted to ensure the proposal safeguards protected species and nearby designated sites.

11. Whilst the proposal results in a limited increase in holiday accommodation, it is not considered to represent a significant expansion of the holiday park with an unacceptable cumulative impact or an encroachment into undeveloped countryside. Instead, it constitutes a logical and well-contained infill development that will support the continued viability and competitiveness of an established tourism business whilst remaining compatible with the statutory purposes of the National Park.
12. Having regard to the scale of the proposal, the comprehensive mitigation measures proposed and the supporting technical assessments, Officers consider that the principle of the development is acceptable. Subject to the imposition of appropriate planning conditions securing the approved landscaping, ecological mitigation, tree protection, drainage and lighting measures, the proposal accords with the objectives of Future Wales, Planning Policy Wales (Edition 12) and the relevant policies of the Pembrokeshire Coast National Park Local Development Plan 2, including Policies 1, 8, 10, 11, 14, 29, 30, 32, 38, 40, 41, 55, 59 and 60.

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

13. Policy 08 (Special Qualities) of LDP2 is a strategy policy which seeks to ensure that the special qualities of the Pembrokeshire Coast National Park are conserved and enhanced. These qualities comprise the characteristics and features which, individually or in combination, contribute to making the National Park unique. The policy identifies, amongst other matters, the importance of the Park's coastal splendour, diversity of landscape, accessibility, richness of habitats and biodiversity, space to breathe, remoteness, tranquillity and wildness. It also requires particular consideration to be given to matters of detail and the cumulative impact of development.
14. Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) seeks the conservation and enhancement of the National Park. It states that development will not be permitted where it would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park, including locally distinctive characteristics. In particular, regard is required to be had to development which causes visual intrusion, introduces or intensifies a use which is incompatible with its location, or fails to harmonise with, or enhance, the landform, landscape and seascape character of the National Park.
15. Policy 29 (Sustainable Design) requires all development proposals to be well designed in terms of place and local distinctiveness and to respond appropriately to the site and its surroundings.
16. The application site forms part of the established Lydstep Beach Village holiday park, occupying a prominent coastal location above Lydstep Haven. The proposal comprises twelve additional holiday accommodation bases, eleven within the area referred to as South of Pine Tree and one within North of Haven Crest, together with associated decking, access, landscaping and infrastructure. Both parcels are located entirely within the existing land ownership and operational area of Lydstep Beach Village. The proposal would therefore not extend the established operational boundary of the holiday park into the surrounding undeveloped countryside, but represents an infill/minor intensification of an existing tourism destination.

17. The existing holiday park is a substantial and established component of the landscape at Lydstep Haven. The Landscape and Visual Impact Assessment (LVIA) identifies Lydstep Beach Village as an established component of the wider landscape. It recognises the existing holiday park as a key characteristic of Seascape Character Area 38 – Lydstep Haven Coastal Waters. The seascape assessment describes the area as including the sheltered east-facing sweep of Lydstep Haven beach with the associated large, organised caravan park and facilities.
18. The two application parcels are consequently not being introduced into an undeveloped coastal landscape. The LVIA identifies that the application sites are contained within the existing visual envelope of the main holiday park and are not seen in isolation from the wider landscape. Where views occur, the application areas are experienced in the context of the existing holiday park, woodland and established landscape structure.

Landscape Character and Capacity

19. The site lies within Landscape Character Area 4 – Manorbier/Freshwater East. The Caravan, Camping and Chalet Supplementary Planning Guidance (CCCSPG) identifies this as a sensitive landscape. Particular sensitivities include the generally undeveloped coastal edge and associated slopes, exposed slopes and skylines, intervisibility with the sea, internationally important coastal habitats and species, and key views from the Pembrokeshire Coast Path and Caldey Island. The guidance also recognises that there is already substantial static caravan development at Lydstep, north of Manorbier and around Freshwater East.
20. The capacity advice within the CCCSPG is therefore an important consideration. The guidance states that there is no capacity for further development where there are existing clusters, on the basis that such clusters already adversely affect landscape character, discreet sites are very limited, and further intensification could lead to cumulative impact. It also states that there does not appear to be opportunity for further expansion of static caravan sites where this would increase the spread of effects.
21. This guidance is afforded significant weight. It would not be appropriate to disregard the identified landscape capacity simply because the proposal is located within the existing holiday park. The proposal would increase the number of static holiday units and therefore represents an intensification of an established use.
22. However, the CCCSPG also explains that landscape capacity takes account of existing development, landscape sensitivity, cumulative effects and the amount of change which a Landscape Character Area can accommodate without adverse changes to its character or key characteristics. The guidance recognises that the effects of individual sites and developments must be considered on a case-by-case basis and that factors including layout, density, infrastructure and unit colour can influence the impact of a development.
23. Accordingly, whilst the strategic capacity advice is an important consideration, it does not remove the need to assess the actual effects of the development proposed. Officers have therefore considered the particular characteristics of the two parcels, their relationship with the existing holiday park, existing woodland and trees, topography, visibility from public rights of way and the proposed landscape mitigation.

Scale of Intensification

24. The cumulative implications of the proposal have been carefully considered, particularly having regard to NRW's concerns and the CCCSPG advice.
25. NRW identifies that the original permission for Lydstep Beach Village provided for 466 units, that the site has subsequently increased to 471 units through other past development, and that the current proposal would increase the overall number of units to approximately 483.
26. The proposal would therefore introduce 12 additional units compared with the existing 471 units, representing an increase of approximately 2.55% in the overall number of holiday accommodation units at the park.
27. The numerical increase is therefore relatively modest when considered in the context of the scale of the established holiday park. This does not, in itself, overcome the landscape considerations associated with further intensification, and the Authority has not treated the percentage increase as determinative. Rather, it provides useful context when considering the actual scale and nature of the proposed change.
28. In particular, the proposal does not result in a corresponding expansion of the physical boundary of the holiday park. The additional units are contained within two parcels which already form part of the established operational area of Lydstep Beach Village. There is therefore no outward expansion of the holiday park into previously undeveloped countryside.
29. The significance of the additional twelve units must consequently be considered primarily in terms of where they are located, their density, their relationship with existing vegetation, their visibility from sensitive receptors and the effectiveness of the proposed landscape mitigation, rather than solely by reference to the increase in unit numbers.
30. This distinction is particularly relevant to NRW's concerns. The Authority acknowledges that the South of Pine Tree parcel is more sensitive than the North of Haven Crest parcel and that the introduction of eleven units into this area will result in a localised change to landscape character. However, the proposal as a whole remains a relatively small incremental change within the context of already established holiday park, rather than a substantial expansion of the tourism development into the wider National Park landscape.

Relationship with Existing Landscape

31. The South of Pine Tree parcel is not an isolated field within the wider countryside. It is contained by existing woodland, mature trees which are protected via TPOs, existing holiday accommodation, internal roads and other established park infrastructure. The submitted Planning Statement describes the parcel as comprising short semi-natural grassland, unmanaged dense scrub and hardstanding tracks, with broadleaved woodland along its north-western and south-eastern edges. A Public Right of Way also passes through the parcel.
32. The LVIA identifies the existing woodland and mature tree structure as an important component of the site's containment. Its visual assessment identifies that the proposed development areas are predominantly screened from receptors in the wider landscape

and that, from most viewpoints, the sites are either not visible or are only very restricted and filtered elements within the wider holiday park.

33. The LVIA identifies that the application areas are contained within the existing visual envelope of the holiday park and that there are no locations where either application parcel is seen in isolation.
34. This is important in considering Policy 14. The proposal would not create a new visually prominent development extending from Lydstep Beach Village into an otherwise undeveloped coastal landscape. Instead, the additional units would sit within an existing developed landscape compartment, surrounded by established vegetation and development.
35. The LVIA concludes that the existing holiday park will remain the dominant component in views towards Lydstep and that the application areas form a small and discrete part of that established development. It concludes that there would be no significant effects on landscape character at national or regional level and that Lydstep Beach would retain its established presence as a key characteristic within the wider landscape.
36. Officers agree with this distinction between localised change within the existing holiday park and significant change to the wider National Park landscape.

South of Pine Tree – Loss of Amenity Grassland and Transitional Landscape

37. NRW has raised a specific concern that the existing amenity grassland at South of Pine Tree provides a transition between the more developed areas of Lydstep Beach Village and the agricultural landscape beyond. NRW considers that the introduction of eleven units and associated access into this area would remove this transitional function, extend the developed area towards the edge of the park and increase the cumulative landscape effect of the existing caravan development.

This concern is acknowledged.

38. The introduction of caravan bases and associated infrastructure will necessarily change the immediate character of the application parcel. The LVIA itself recognises this and assesses the local landscape effect as a moderate adverse effect in the short term, principally arising from the replacement of amenity grassland with formal caravan accommodation.
39. The issue for determination is therefore whether this localised change would result in an unacceptable adverse effect on the special qualities, landscape character or visual amenity of the National Park when the development is considered as a whole and having regard to the proposed mitigation.
40. Officers consider that the landscape function of the grassland should be assessed in the context of the wider landscape structure rather than in isolation. The parcel is already enclosed on significant boundaries by mature woodland, protected trees and established holiday park development. The submitted Green Infrastructure information identifies the principal loss as poor-quality semi-improved neutral grassland and proposes replacement and enhancement through areas of wildflower meadow, native planting and additional landscape structure. The submitted Planning Statement identifies that the existing scrub and mixed scrub areas will be retained and supplemented, with additional scrub and wildflower meadow planting proposed.

41. The proposal would therefore change the balance between open grassland and developed land within this parcel but would not remove the wider landscape structure which provides the site's relationship with the surrounding countryside. The proposed planting will also strengthen the internal landscape structure and assist in providing a softer transition between the development and surrounding woodland and landscape.

Density and Cumulative Intensification

42. NRW has raised concern that the proposal represents continued intensification of an already substantial holiday park, noting a previous increase from the original 466 units to 471 units and now the proposed total of approximately 483 units. NRW considers that this cumulative intensification is particularly important because of the landscape sensitivity identified by the CCCSPG.
43. This cumulative consideration has been taken into account. Policy 8 expressly requires matters of detail and cumulative impact to be given special consideration, and the CCCSPG itself recognises that existing development is relevant to landscape capacity.
44. Nevertheless, the physical and visual effect of the additional units must be considered in the context of their actual location within that established development. The proposal does not involve the creation of a new caravan park, a new access onto the public highway or the establishment of a new development area outside the existing holiday park. The units occupy two relatively contained parcels within the existing park and are surrounded by existing development and established vegetation, including sways of trees that are protected by a TPO.
45. The LVIA identifies the application areas as being within the existing visual envelope of the holiday park and concludes that they would not be perceived as a separate development in the wider landscape.
46. Officers therefore consider that, although the proposal constitutes an intensification of the existing use, its incremental visual effect on the wider National Park landscape would be limited. The principal landscape effect is localised to the South of Pine Tree parcel and to users of the footpath passing through it.

Views from the Pembrokeshire Coast Path

47. The relationship with the Pembrokeshire Coast Path is an important consideration given the sensitivity attached to the Coast Path within both the CCCSPG and the special qualities of the National Park.
48. The CCCSPG specifically identifies key views from the Pembrokeshire Coast Path as a sensitivity within LCA4. The LVIA identifies walkers as a high-sensitivity visual receptor and considers the Coast Path at viewpoints 6 and 8–10.
49. Officers have also considered the relationship with the Coast Path through a site inspection, including walking the relevant section of the Coast Path in the vicinity of Lydstep Haven. This has enabled the Authority to consider the actual visual relationship between the proposed development areas and the route, in addition to the submitted LVIA.
50. The site inspection confirms the importance of the established mature vegetation and wooded backdrop in containing views towards the application site. The existing holiday

park is already a prominent and established component of views from the Coast Path, with the additional units being experienced, where visible, in the context of that existing development and woodland structure rather than as isolated structures within undeveloped coastal landscape.

51. The LVIA records that from viewpoint 6 there are no views into the application sites, with the existing evergreen and deciduous tree cover and existing caravan development preventing upward views into South of Pine Tree.
52. At viewpoint 8, the LVIA identifies very restricted views towards South of Pine Tree through deciduous tree cover. These views are described as barely discernible during summer when vegetation is in full leaf, with potentially greater visibility during winter. The prevailing view remains that of a densely wooded skyline, with existing caravans embedded within that wooded context.
53. NRW itself agrees with the LVIA's assessment that the more distant viewpoints, including viewpoints 1–6 and 8–14, benefit from the screening effect of the tree belts surrounding the site and would experience negligible visual effects.
54. Officers therefore accept that the Coast Path is a highly sensitive visual receptor but consider that the actual degree of visibility of the application areas is limited. The proposal would not create a new prominent feature visible across the wider coastal landscape or break the established wooded skyline.

Viewpoint 7 and the Public Right of Way

55. The proposal also accommodates Public Footpath SP33/22, which passes through part of the site and forms part of the alternative high-tide route of the Pembrokeshire Coast Path National Trail. PCNPA's Public Rights of Way Officer raises no objection, subject to an informative requiring the public right of way to remain unobstructed during both construction and operation of the development, with no reduction in its width or accessibility.
56. The more significant visual issue identified by both the LVIA and NRW relates to the Public Right of Way through South of Pine Tree, rather than the more distant views from the Coast Path.
57. The LVIA identifies viewpoint 7 as the one location where a moderate visual effect would occur. It acknowledges that the receptor group has a high susceptibility to change and that the magnitude of change would be moderate and readily perceptible in the short term. Existing views are across amenity grassland and include stored and static caravans in a relatively informal arrangement. The proposed landscaping would establish a more defined route using native hedgerows and feathered trees, with the intention of partially screening adjacent development.
58. NRW agrees that the immediate visual effect would be moderate but identifies two concerns with the LVIA's conclusion that this would reduce to negligible in the long term. NRW considers that the proposed access road interrupts the planted corridor and allows views across the development. It also considers that continuous tall hedging could create a tunnel-like route which may feel enclosed or claustrophobic for users and could raise community safety concerns.

These concerns have been considered carefully.

59. Officers accept that the access road will create a break in the proposed vegetation and that views towards the units will therefore not be completely eliminated. However, the purpose of the planting is not considered to be complete visual screening. It will provide structure, definition and landscape integration to a route which currently passes through an open area containing grassland, stored caravans and existing static accommodation.
60. The existing condition of the route is relevant. The LVIA records that users currently experience views across amenity grassland, stored caravans and static caravans in an ad hoc arrangement. The proposed landscape treatment as proposed will make the route more formal through the use of new landscaping which will define the route better for users of the footpath resulting in the route being more rationalised and legible footpath, defined by native hedgerows and feathered trees.
61. Officers do not consider that the route would become enclosed by an uninterrupted high hedge. The detailed landscape treatment provides a mixture of native hedgerows, feathered trees, scrub and grassland, rather than a uniform engineered screen. This will allow a degree of visual permeability while providing a more clearly defined landscape corridor.
62. The detailed implementation of the landscaping will therefore be important. A condition securing the approved landscape scheme, its establishment, and subsequent maintenance will ensure that the planting remains appropriate to the National Park setting and does not develop into an inappropriate continuous barrier.
63. It is also relevant that the Public Rights of Way Officer has raised no objection to the proposal, subject to the continued protection and availability of the route. The existing public right of way will remain in use and will not be diverted or extinguished as a consequence of the development.
64. On balance, the Authority accepts that there will be a moderate adverse visual effect for users of the PROW in the short term, as identified by the LVIA. However, given the existing developed context, the relatively localised section of route affected, the existing vegetation, the proposed landscape structure and the requirement for the route to remain open and legible, it is considered that the effect would not amount to an unacceptable adverse effect on the special qualities of the National Park.

Trees, Woodland and TPO Protection

65. The existing mature tree structure is a particularly important part of the site's landscape containment. The Arboricultural Impact Assessment confirms that the majority of boundary trees will be retained and that the development will remain within a well-treed environment. One Category C tree is proposed for removal, with compensatory planting provided, while retained trees will be protected through the submitted Arboricultural Method Statement.
66. Importantly, the site also benefits from Tree Preservation Order protection. The arboricultural survey identifies TPO64 W12, covering trees T1–T6 and the edge of G1 within the surveyed area.
67. The presence of these protected trees provides an additional layer of protection to the established vegetation which forms an important part of the visual containment of the holiday park. The retention of this vegetation is therefore not simply dependent upon

the proposed landscaping scheme; the protected trees are also subject to the Authority's existing tree protection controls.

68. The submitted Arboricultural Method Statement provides for tree protection fencing, protection of Root Protection Areas and appropriate controls for works within sensitive rooting areas. The retention of the majority of the existing trees and replacement of the limited tree loss will maintain the well-treed character of the site.
69. Officers therefore consider that the existing mature tree structure provides an important and durable component of the site's landscape containment, including during the period in which new landscape planting is becoming established.

Landscape Mitigation and Long-Term Assimilation

70. The effectiveness of mitigation is central to the assessment because of NRW's disagreement with the LVIA concerning the extent to which the proposed landscaping will reduce the identified adverse effects over time.
71. The LVIA identifies the retention and enhancement of existing vegetation as a principal design objective. The proposed landscape treatment includes native woodland planting, native scrub, native hedgerows and feathered trees, structure planting around the development and wildflower grassland to provide a softer transition to adjacent woodland.
72. The landscape proposals are intended not simply to screen the caravans but to reinforce the existing wooded character of the holiday park and improve the green infrastructure structure within the application parcels. The submitted Planning Statement identifies the retention of existing scrub and mixed scrub, additional scrub planting and areas of wildflower meadow and native planting.
73. The LVIA identifies extensive tree cover as a principal reason why the application sites are well contained. It concludes that the depth of the existing tree cover restricts views even during winter and that the proposed landscape infrastructure will add to the filtering and visual buffer. The LVIA also specifically identifies muted-colour caravans as a mitigation measure, ensuring that glimpsed development recedes into the wooded slope when viewed in the context of the existing caravans.
74. Officers consider this to be an important element of the mitigation strategy. The finished colours of the proposed caravan units will therefore be controlled by condition and shall be restricted to recessive, muted tones appropriate to the wooded coastal setting. This will prevent the introduction of highly contrasting finishes which could otherwise increase the visual prominence of the units.
75. This also directly responds to NRW's position in respect of the isolated north-eastern unit and North of Haven Crest, where NRW has indicated that it has no landscape concerns subject to appropriate design, materials and finishes.
76. The landscaping will also be subject to conditions securing implementation and maintenance. This is necessary to ensure that the mitigation relied upon in reaching the planning judgement is delivered and maintained in the long term.

North of Haven Crest

- 77. The landscape and visual effects of the single unit at North of Haven Crest are materially different from those associated with South of Pine Tree.
- 78. The site is a small, enclosed area within the existing holiday park, surrounded by existing woodland and mature trees and located away from the principal PROW route. NRW specifically agrees that the single unit at North of Haven Crest would not result in a significant alteration to landscape character or visual amenity because of its scale, screening and setting, subject to appropriate design, materials and finishes.
- 79. Officers agree with this assessment. The unit is contained within the existing developed landscape and does not result in the same loss of open grassland or relationship with the PROW that is relevant to the South of Pine Tree parcel.

Seascape and Wider Coastal Landscape

- 80. The coastal setting of Lydstep is an important component of the National Park's special qualities. The CCCSPG identifies intervisibility with the sea and key views from the Coast Path and Caldey Island as important sensitivities within LCA4.
- 81. The LVIA's assessment demonstrates that the application sites are not readily discernible from the wider seascape. The assessment identifies no views into the application sites from the more distant viewpoints on Caldey Island and from the ferry to Tenby, while the sites are predominantly contained by existing woodland and existing development.
- 82. The proposal would consequently remain visually associated with the established holiday park rather than introducing a new isolated built element into the undeveloped coastal landscape.

Response to NRW's Landscape Recommendations

- 83. NRW has recommended that, in order for the scheme to be acceptable, the development should be revised to remove all pitches from the amenity grassland to the south of Pine Tree and significantly reduce the overall number of new units. NRW further recommends that any revised layout should reduce density, move units further away from the PROW, remove the access track, retain and enhance the amenity grassland and provide landscape planting more closely reflecting the treatment surrounding the isolated north-eastern unit.

Officers have carefully considered each of these recommendations.

- 84. The concern regarding the amenity grassland is acknowledged and is given weight in the assessment. However, the grassland is not considered in isolation from the wider landscape structure of the parcel, which includes existing woodland, scrub, mature trees and established caravan development. The proposed landscape treatment will retain and enhance areas of green infrastructure and introduce additional native planting and wildflower meadow.
- 85. In respect of density, the Authority acknowledges that the twelve units constitute an intensification of the existing holiday park. However, this represents approximately a 2.55% increase in the existing number of units, from 471 to 483. The additional

accommodation remains entirely within the existing operational area of the holiday park and does not extend the site into the wider countryside.

86. The recommendation to move the units further from the PROW has also been considered in the context of the existing layout, the submitted landscape scheme and the requirement to maintain an accessible and legible public route. The proposed landscape structure will provide separation and filtering of views without requiring the PROW to become an enclosed or tunnel-like route.
87. With regard to the access track, the Authority considers that access is necessary to serve the proposed units and that its visual effect must therefore be addressed through the overall landscape design rather than its removal. The access is contained within the established holiday park and does not create a new external access or significant new intrusion into the wider landscape.
88. Officers therefore do not consider that the identified landscape effects require the wholesale redesign or reduction of the scheme recommended by NRW. Instead, the identified effects can be appropriately addressed through the retention and protection of the existing landscape structure, additional planting, management of the PROW corridor, control over caravan colours and finishes together with the implementation of the submitted landscaping and green infrastructure measures.

Overall Landscape and Visual Assessment

89. It is recognised that the development is situated within a sensitive National Park landscape and that the CCCSPG identifies significant constraints on further static caravan intensification within LCA4. This is not disregarded in reaching the recommendation.
90. Officers have carefully considered NRW's concerns regarding the loss of amenity grassland, the cumulative intensification of Lydstep Beach Village, the relationship with the PROW, the density of units and the effectiveness of the proposed landscaping.
91. Officers accept that the introduction of eleven units at South of Pine Tree will result in a discernible change to the immediate landscape and that the short-term visual effect experienced by users of the PROW will be moderate adverse. This is a genuine adverse effect and is given appropriate weight in the planning balance.
92. However, the wider assessment demonstrates that the application sites are contained within the existing visual envelope of Lydstep Beach Village and are not experienced as an isolated extension into the undeveloped coastal landscape. The LVIA identifies no significant adverse visual effects from the majority of viewpoints and confirms that the existing wooded landscape provides substantial screening. NRW itself agrees with the LVIA's assessment of the more distant viewpoints.
93. The existing mature tree structure, including trees protected by TPO64 W12, provides a significant and durable element of visual containment. The proposed landscaping will further reinforce this structure through native woodland, scrub, hedgerow and feathered tree planting, together with areas of wildflower grassland.
94. The use of recessive and muted external colours will be secured through condition and will ensure that the proposed caravans do not introduce a visually prominent or highly contrasting feature into the wooded coastal setting. This directly reflects the mitigation relied upon within the LVIA.

95. Officers' site inspection, including walking the relevant sections of the Coast Path and PROWs, has also informed this assessment. It is considered that the existing mature vegetation and established holiday park development provide substantial visual context and containment, and that the proposal would generally be experienced as an incremental change within an existing tourism landscape rather than a new development imposed upon the undeveloped coastal landscape.
96. The cumulative increase in accommodation numbers is also acknowledged. However, the proposed increase from 471 to 483 units represents approximately 2.55% of the existing number of units. Whilst this does not negate the CCCSPG's capacity considerations, it demonstrates that the proposal represents a relatively modest numerical increase to a substantial established holiday park. The Authority has therefore considered the percentage increase as contextual evidence of the scale of the proposed intensification rather than as a justification for disregarding landscape sensitivity.
97. Overall, it is considered that the principal adverse effects are localised, particularly to the South of Pine Tree parcel and the short section of PROW passing through it. The wider landscape and seascape effects are limited by the existing woodland, mature trees, topography and established character of Lydstep Beach Village. The proposal would not result in significant visual intrusion into the wider National Park, nor would it introduce a visually isolated development into the undeveloped coastal landscape.
98. Officers have therefore reached a different conclusion from NRW in respect of the overall acceptability of the landscape impacts. This is not because NRW's concerns have been discounted, but because the Authority considers that the actual site-specific effects, the limited scale of the numerical increase, the established developed context, the existing protected tree structure and the proposed mitigation are sufficient to prevent the development resulting in an unacceptable adverse effect on the special qualities or landscape and seascape character of the National Park.
99. Subject to conditions securing the approved landscaping and its long-term management, protection of existing trees and their Root Protection Areas, appropriate external materials, recessive/muted finished colours for all proposed caravan units, implementation of the approved lighting strategy, protection of the PROW and the relevant ecological mitigation measures, the development is considered to conserve the special qualities of the Pembrokeshire Coast National Park.
100. On balance, the proposal is therefore considered to accord with Policies 08, 14 and 29 of LDP2, having regard to the objectives and guidance contained within the Landscape Character Assessment, Seascape Character Assessment and Caravan, Camping and Chalet Supplementary Planning Guidance.

3.3 Amenity and Privacy:

101. 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.

102. The application relates to the installation of 12 caravan bases, decking and associated infrastructure within the established operational area of Lydstep Beach Village, an existing holiday park accommodating a substantial number of holiday caravans. The proposed units are located within areas already associated with the holiday park and will not introduce a new tourism use but rather represent a modest extension to the existing accommodation within the site.
103. The proposed caravan bases have been carefully sited within existing landscaped areas and amongst mature trees and vegetation, with additional landscaping proposed to further integrate the development into its surroundings. The submitted Landscape and Visual Impact Assessment concludes that the effects of the development will be localised and that there will be no significant adverse landscape or visual effects. Existing vegetation and proposed planting will assist in reducing intervisibility both within the holiday park and from surrounding public viewpoints.
104. In terms of residential amenity, the nearest permanent residential properties are located outside the holiday park boundary and are separated from the proposed development by existing topography, established vegetation and intervening development. Given the separation distances and the established tourism use of the wider site, it is not considered that the proposal would result in unacceptable overlooking, loss of privacy, overshadowing or overbearing impacts upon neighbouring occupiers.
105. The increase in visitor accommodation is modest in the context of the overall scale of the site, and any activity generated would be consistent with the established holiday park use. The proposal is not considered likely to give rise to significant additional levels of noise, disturbance, traffic or artificial lighting beyond those already associated with the lawful operation of the existing holiday park, the existing users of this park and specifically those in close proximity to the proposed new developments. As such, officers consider that the current proposal will not have a significant adverse impact in respect of privacy or amenity on the existing caravan units within the park.
106. Overall, it is considered that the proposal would not have an unacceptable adverse effect upon the amenity of neighbouring occupiers or visitors to the National Park and complies with the requirements of Policy 30 (Amenity) of LDP2.

3.4 Biodiversity Protected Sites & Landscaping

Biodiversity impacts

107. PPW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 require 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.

108. The application site lies within an established holiday park but is located in close proximity to a number of internationally and nationally designated ecological sites, including the Limestone Coast of South West Wales Special Area of Conservation (SAC) and the Lydstep and Tenby Burrows Site of Special Scientific Interest (SSSI). Consequently, the ecological implications of the proposal have been a key consideration throughout the assessment.
109. The application is accompanied by an Ecological Impact Assessment (EclA), Green Infrastructure Statement, Bat Conservation Plan, Construction Environmental Management Plan (Biodiversity) and Exterior Lighting Strategy. The EclA identifies that the principal ecological receptor is the greater horseshoe bat population associated with the Limestone Coast of South West Wales SAC, together with other protected bat species using woodland edges and hedgerows for commuting and foraging. The assessment concludes that, subject to the implementation of the proposed mitigation and enhancement measures, the development would not result in significant adverse ecological effects.
110. The Authority's Ecologist confirms that the submitted Bat Conservation Strategy, Construction Environmental Management Plan (CEMP) and Lighting Strategy adequately address the potential impacts upon greater and lesser horseshoe bats associated with the Limestone Coast of South West Wales Special Area of Conservation (SAC). It is recommended that all ecological mitigation, planting and habitat protection measures are implemented in accordance with these approved documents.
111. The response advises that a Landscape Environmental Management Plan (LEMP) and a Precautionary Working Method Statement (PWMS) should be submitted and approved prior to the commencement of development to secure long-term habitat management and safeguard protected species during construction. The Green Infrastructure proposals should also be implemented and maintained for the lifetime of the development, with all planting comprising native species.
112. The Authority's Ecologist notes that the site has low potential to support dormice but recommends a precautionary fingertip search of scrub to be removed, together with an informative advising the applicant of their responsibilities should dormice be encountered unexpectedly during the works.
113. The response also highlights the presence of Japanese Knotweed on the site and recommends that no planting within the ecological enhancement area takes place until its eradication has been confirmed and an appropriate management strategy has been agreed. Bamboo identified on the site should also be assessed and managed to prevent future spread.
114. Finally, the Authority's Ecologist recommends additional biodiversity enhancements, including the provision of a range of woodcrete bat boxes and bird boxes suitable for the species recorded on site, with these measures incorporated into the approved Green Infrastructure Statement and implemented as part of the development.
115. NRW initially raised concerns regarding the adequacy of the ecological information submitted. Following the submission of additional information, including the Bat Conservation Plan and Construction Environmental Management Plan, NRW

confirmed that these documents should be secured by planning condition to ensure the ecological mitigation is implemented throughout construction and operation.

116. The proposal incorporates a range of mitigation measures including:
- retention of existing mature woodland, hedgerows and key habitat corridors;
 - implementation of a sensitive lighting strategy to maintain dark commuting routes for bats;
 - timing and management of vegetation clearance;
 - ecological supervision where required;
 - installation of bat and bird boxes;
 - habitat enhancement and long-term ecological management;
 - implementation of the submitted Construction Environmental Management Plan and Bat Conservation Plan.
- Subject to these measures being secured by condition, Officers are satisfied that the proposal complies with Policies 10 and 11 of LDP2.

Net Benefit for Biodiversity and Green Infrastructure

117. 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 well-being.
118. 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.
119. 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 to demonstrate how the stepwise approach has been applied.
120. The application is accompanied by a comprehensive Green Infrastructure Statement which identifies the existing ecological assets of the site and demonstrates how these have informed the design and layout of the proposal. Existing woodland, mature trees, hedgerows and species-rich vegetation have been retained wherever practicable, with the proposed development concentrated within contained areas of managed grassland. The proposal also includes additional native tree, shrub and hedgerow planting together with the creation and long-term management of approximately 3,600m² of ecological enhancement habitat, providing measurable biodiversity enhancements over the existing baseline.
121. The Authority's Principal Planning Officer (Environment) considered the Green Infrastructure Statement and concluded that the majority of the information required to demonstrate a biodiversity net benefit had been provided. Whilst some additional details relating to landscape implementation, future management, Construction Exclusion Zone fencing and the incorporation of traditional Pembrokeshire hedgebanks alongside the Public Right of Way were requested, these matters were considered capable of being addressed by planning condition rather than preventing the grant of planning permission.
122. The Officer raised no objection, subject to conditions requiring:
- implementation of the approved landscaping scheme;

- long-term landscape management and maintenance;
 - tree protection measures;
 - implementation of biodiversity enhancements;
 - provision of Pembrokeshire hedgebanks where appropriate;
 - arboricultural supervision during construction.
123. Officers are therefore satisfied that the proposal follows the step-wise approach required by Planning Policy Wales and will provide an overall net benefit for biodiversity.
124. The application site lies in close proximity to the Lydstep and Tenby Burrows Site of Special Scientific Interest (SSSI) and therefore has the potential to affect nationally important ecological interests.
125. NRW was consulted on the proposal in its capacity as the statutory nature conservation body. Following receipt of the additional ecological information and mitigation documents, NRW advised that ecological impacts could be satisfactorily managed through the implementation of the submitted mitigation measures and recommended that these documents be secured by planning condition.
126. Having regard to the submitted ecological assessments and the recommended planning conditions, Officers are satisfied that the proposal would not adversely affect the features for which the SSSI has been designated and therefore complies with the Wildlife and Countryside Act 1981 (as amended) and the relevant provisions of Planning Policy Wales.

Habitat Regulations Assessment

127. 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.
128. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an Appropriate Assessment (AA) of the implications for the designated features, consult NRW and have regard to NRW's representations.
129. The site lies within approximately 50 metres of the Limestone Coast of South West Wales Special Area of Conservation (SAC), which is designated for its vegetated sea cliffs, dune habitats and greater horseshoe bat population. As a result, the Authority undertook a Habitats Regulations Assessment (HRA) screening exercise under the Conservation of Habitats and Species Regulations 2017.
130. The HRA identified the potential for likely significant effects arising from disturbance to commuting and foraging bats, habitat loss and lighting impacts. An AA was therefore undertaken, taking account of the submitted Ecological Impact Assessment, Bat Conservation Plan, Construction Environmental Management Plan and Exterior Lighting Strategy, together with the consultation responses received from Natural Resources Wales.

131. The AA concludes that, subject to the implementation of the submitted ecological mitigation, lighting controls and habitat enhancement measures secured through planning conditions, the proposal will not adversely affect the integrity of the Limestone Coast of South West Wales Special Area of Conservation, either alone or in combination with other plans or projects.
132. NRW has been formally consulted on the HRA/AA process, and a further verbal update will be given at the DM Committee meeting.
133. Subject to consideration of the response from NRW on the HRA/AA, Officers would be satisfied that the proposal complies with the requirements of the Conservation of Habitats and Species Regulations 2017, the Environment (Wales) Act 2016, the Wildlife and Countryside Act 1981 (as amended) and Policies 10 and 11 of the Pembrokeshire Coast National Park Local Development Plan 2.

3.5 Access and Parking

134. 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. Additionally, Policy 60 (Impacts of Traffic) of LDP2 permits development where appropriate access can be achieved, and potential transport impacts can be satisfactorily mitigated.
135. The proposal will utilise the existing established vehicular access serving Lydstep Beach Village from the A4139. No alterations are proposed to the principal site access, which currently serves the holiday park and has an established history of accommodating visitor traffic associated with the site's operation. The proposed development comprises a modest increase of 12 holiday accommodation units within an existing holiday park of approximately 471 units and is therefore not considered to generate a level of additional traffic that would materially affect the operation or capacity of the surrounding highway network.
136. The proposal includes the formation of internal estate roads and parking spaces to serve the proposed holiday accommodation. The internal layout has been designed to integrate with the existing circulation network within the holiday park and provides suitable access for vehicles, cyclists, pedestrians and service traffic.
137. The Highway Authority has been consulted on the application and raises no objection, confirming that the existing access arrangements are satisfactory and that the proposal would not have an unacceptable impact on highway safety or the operation of the local highway network.
138. In respect of drainage associated with the access roads and hardstanding, Pembrokeshire County Council's Civil Engineering Section raises no objection and advises that the submitted drainage strategy is capable of forming the basis of a future Sustainable Drainage Approval Body (SAB) application. Separate SAB approval will be required prior to the commencement of development.

139. Having regard to the scale of the proposal, the use of the existing site access, the provision of appropriate internal access and parking, and the absence of any objection from the Highway Authority or Public Rights of Way Officer, it is considered that the development would not give rise to unacceptable highway safety, traffic or accessibility impacts. The proposal therefore complies with Policies 59 (Sustainable Transport) and 60 (Impacts of Traffic) of the Pembrokeshire Coast National Park Local Development Plan 2.

3.6 Surface Water Drainage:

140. Policy 32 (Surface Water Drainage) of LDP2 requires that development incorporate sustainable drainage systems for the disposal of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.
141. The application is accompanied by a detailed drainage strategy which proposes that surface water generated by the development will be disposed of by means of soakaways, subject to satisfactory ground conditions and percolation testing. The drainage proposals have been designed to manage runoff within the site and are intended to form part of a sustainable drainage solution for the proposed development.
142. Pembrokeshire County Council's Civil Engineering Section, in its role as the Sustainable Drainage Approval Body (SAB) consultee, has reviewed the submitted drainage information and raises no objection to the proposal. The consultee advises that the submitted drainage strategy is capable of forming the basis of a future SAB application, although a separate application for Sustainable Drainage Approval will be required prior to the commencement of development, as required under Schedule 3 of the Flood and Water Management Act 2010.
143. The application site is not identified as being at unacceptable risk of flooding, and there is no evidence to indicate that the proposed development would increase flood risk either within the site or elsewhere. Subject to securing the development in accordance with the approved drainage strategy and obtaining the necessary SAB approval before works commence, Officers are satisfied that the proposal incorporates an appropriate approach to the management of surface water.
144. Accordingly, the proposal is considered to comply with Policy 32 (Surface Water Drainage) of the Pembrokeshire Coast National Park Local Development Plan 2 and the objectives of Technical Advice Note 15 (Development, Flooding and Coastal Erosion).

4. Conclusion

145. The proposed development comprises the installation of 12 bases for the siting of holiday accommodation (falling within the definition of a caravan), together with associated decking, internal access roads, parking, landscaping and infrastructure works within the established operational area of Lydstep Beach Village.
146. The principle of the development is considered acceptable as a modest infill proposal within an existing holiday park and accords with the objectives of Future Wales – The National Plan 2040, Planning Policy Wales (Edition 12) and the relevant policies of the

Pembrokeshire Coast National Park Local Development Plan 2. The proposal has been supported by a comprehensive package of technical assessments, including a Planning Statement, Landscape and Visual Impact Assessment, Green Infrastructure Statement, Ecological Impact Assessment, Arboricultural Impact Assessment, Bat Conservation Plan, Construction Environmental Management Plan and Lighting Strategy, all of which have informed the design and mitigation of the scheme.

147. The proposal has been carefully assessed against the statutory purposes of the Pembrokeshire Coast National Park. Whilst the site occupies a sensitive coastal location within Landscape Character Area 4 – Manorbier/Freshwater East and Seascape Character Area 38 – Lydstep Haven Coastal Waters, the proposed development is confined to two contained infill areas within the existing holiday park and does not extend the established site boundary into the surrounding countryside. Subject to the recommended planning conditions securing landscaping, tree protection, ecological mitigation, biodiversity enhancement and lighting controls, the proposal is not considered to result in unacceptable harm to the landscape, seascape or the special qualities of the National Park.
148. The Authority's Ecologist has also undertaken an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017. Having regard to the submitted ecological information and the mitigation secured by planning condition, it has been concluded that the proposal will not adversely affect the integrity of the Limestone Coast of South West Wales Special Area of Conservation, either alone or in combination with other plans or projects. This is currently subject to NRW consultation and a verbal update will be given.
149. No objections have been raised by the Highway Authority, the Public Rights of Way Officer, the Sustainable Drainage Approval Body or the Authority's Principal Planning Officer (Environment), subject to appropriate planning conditions. Whilst Manorbier Community Council does not support the proposal and Penally Community Council objects on procedural grounds, Officers are satisfied that the application has been appropriately assessed in accordance with the Development Plan and all other material considerations. Natural Resources Wales' concerns regarding landscape matters have been carefully considered; however, having regard to the submitted Landscape and Visual Impact Assessment, the site-specific characteristics, and the proposed mitigation, Officers conclude that the development is acceptable.
150. Overall, it is considered that the proposal complies with the relevant provisions of Future Wales, Planning Policy Wales (Edition 12), Technical Advice Notes, and Policies 1, 8, 10, 11, 14, 29, 30, 32, 38, 40, 41, 55, 59 and 60 of the Pembrokeshire Coast National Park Local Development Plan 2. Accordingly, the application is recommended for approval subject to a positive response from NRW on the HRA/AA process and the conditions set out below.
151. 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

Subject to formal confirmation from Natural Resources Wales that they agree with the Authority's Habitats Regulations Assessment, the recommendation is for Approval 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:

- LB-012-01 Proposed Site Plan North of Haven Crest (Received 11/03/25)
- LB-011-01 Proposed Site Plan South of Pine Tree (Received 11/03/25)
- LB-009-01 Proposed Site Plan (Received 11/03/25)
- LB-013-01 Proposed Site Sections (Received 11/03/25)
- SK01 B Landscape Proposals Plan South of Pine Trees (Received 11/03/25)
- SK02 Landscape Proposals North of Haven Crest (Received 11/03/25)
- SK03 Landscape Section Plan (Received 11/03/25)
- LB-001-01 Location Plan (Received 11/03/25)
- Lighting Layout Area 5 (Received 11/03/25)
- Lighting Layout Area 7 (Received 11/03/25)
- Construction Environment Management Plan (Received 30/06/25)
- Drainage Strategy Surface & Foul Water (Received 11/03/25)
- Lighting assessment (Received 11/03/25)
- Green Infrastructure Statement (Received 11/03/25)
- Landscape & Visual Impact Assessment Rec 11/03/25
- Bat Conservation Plan (Received 25/07/25)

Reason: 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. A landscape management plan, including implementation, management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to and approved in writing by the local planning authority prior to the occupation of any of the holiday accommodation units on the site. The landscape management plan shall be carried out as approved. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by this authority.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites, and to protect the amenity, landscape and biodiversity value of the site and surrounding area. Policy: 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 07 –Biodiversity, Technical Advice Note

(TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

4. No development, demolition or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme relating to the immediate landscape. The approved scheme shall include the following details:
- Clarification of planting/landscaping proposals including the ecological enhancement area
 - Scale plan on proposed site layout showing precise site-specific locations
 - Schedules of plants (trees and hedges)
 - Plant species
 - Plant supply sizes
 - Proposed numbers of each proposed species
 - Hedge planting density and method (e.g. double staggered)
 - Details of any constructed green features – Green roofs / Pembrokeshire hedgebanks

Development shall thereafter take place in accordance with the approved details.

Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by this authority.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites, and to protect the amenity, landscape and biodiversity value of the site and surrounding area. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

5. Upon completion of the development, evidence will be provided in writing to the Local Planning Authority that the details of the Arboricultural Method Statement (AMS) have been adhered to, including the project arboriculturist supervision schedule. Proof will be demonstrated through the submission of a single report, which summarises the details of each project arboriculturist visit, including relevant photographic evidence of adherence to the AMS and associated arboricultural information provided and approved by this authority.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites, and to protect the amenity, landscape and biodiversity value of the site and surrounding area. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

6. No development, including site clearance, demolition, vegetation removal or groundworks, shall commence until a Precautionary Working Method Statement (PWMS) has been submitted to and approved in writing by the Local Planning Authority. The PWMS shall set out the measures to be implemented before and during

construction to ensure that protected species and retained habitats are not harmed, injured, disturbed or killed and shall include:

- a) details of ecological constraints identified on the site
- b) measures to protect retained habitats and ecological features during construction
- c) procedures for vegetation clearance and timing of works;
- d) measures to safeguard nesting birds and any other protected species that may be present;
- e) protocols to be followed should protected species be encountered during the works;
- f) pollution prevention and lighting control measures where relevant;
- g) the roles and responsibilities of site personnel and any appointed ecologist; and
- h) a programme for implementation, monitoring and compliance.

The development shall thereafter be carried out in full accordance with the approved PWMS unless otherwise agreed in writing by the Local Planning Authority.

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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

7. Prior to the siting of any new caravan units on site, a detailed Bat and Bird Box Scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall accord with the recommendations of the approved Ecological Impact Assessment and shall include:

- a) the provision of a minimum of 10 bat boxes of varying designs suitable for the bat species recorded on site, including Pipistrelle species, Noctule, Serotine and Myotis species;
- b) confirmation that all bat boxes shall be constructed from woodcrete or Woodstone (or other material first agreed in writing by the Local Planning Authority);
- c) details of the location, specification and orientation of the bat boxes, which shall be installed on retained trees at a height of not less than 3 metres, on a predominantly southerly aspect and clear of branches or other obstructions that may impede access;
- d) the provision of a minimum of 6 bird boxes comprising:
 - 2 no. 25mm aperture boxes;
 - 2 no. 32mm aperture boxes; and
 - 2 no. open-fronted boxes;
- e) confirmation that all bird boxes shall be constructed from woodcrete or Woodstone (or other material first agreed in writing by the Local Planning Authority);
- f) details of the location, specification and orientation of the bird boxes, which shall be installed on retained trees at a height of between 3 and 4 metres on a northerly aspect and positioned away from the prevailing weather conditions; and
- g) a timetable for installation.

The approved boxes shall be installed in accordance with the approved details prior to the first occupation/use of the development and shall thereafter be retained and maintained for the lifetime of the development.

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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

8. In the first available planting and seeding seasons following commencement of development hereby approved, planting must be implemented according to the Green Infrastructure Statement with the exception of the ecological area which will only commence once details of the Japanese knotweed have been received and a plan for eradication formulated.

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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

9. Any existing plants retained or translocated; or new plants planted or seeded in accordance with the approved landscaping 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.

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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

10. 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).

11. All retained trees, hedgebanks and hedge boundary features and/or any trees whose canopies overhang the site shall be protected by the duration of the development (in accordance with BS5837: 012 'Trees in relation to design, demolition, and construction – Recommendations'). The type and position of protection measures shall be submitted to and approved by the authority prior to commencement of development.

The approved protection measures shall be implemented prior to any equipment, machinery or materials being brought onto the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed within any approved protection area, and the ground levels within those areas shall not be altered. No works to trees will be carried out without prior approval from this authority. **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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.

12. No excavation shall be made within the root protection areas of any retained trees without the prior written consent of the local planning authority. **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. Policy: 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 07 –Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), and Technical Advice Note (TAN) 10: Tree Preservation Orders.
13. No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network **Reason:** To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan 2 – Policy 8 (Special Qualities), Policy 29 (Sustainable Development), and Policy 32 (Surface Water Drainage).
14. A colour palette for all new caravans will be agreed in writing with the National Park Authority prior to the installation of the first new caravan. Any new caravan placed on site must comply with the agreed colour palette unless a new palette is subsequently agreed in writing with the National Park Authority. **Reason:** To protect the character and appearance of the site and its setting and the amenity and appearance of the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities) and 14 (Conservation of the Pembrokeshire Coast National Park).
15. The development hereby approved shall be occupied as holiday accommodation only between 1st March and 9th January in any calendar year and shall not be occupied as a person's sole or main place of residence. An up-to-date register shall be kept at the holiday accommodation hereby permitted and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all occupiers of the accommodation, their main home addresses, and their date of arrival and departure from the accommodation. **Reason:** To ensure that the accommodation is occupied solely for holiday letting purposes and not for any other residential purpose. Policy: Local Development Plan 2, Policy 40 (Self Catering Development).

16. No more than 483 caravans, as defined in the Caravan Sites and Control of Development Act 1990 and the Caravan Sites Act 1968, shall be sited on the land within the overall site at any time.

Reason: To protect the visual appearance of the site and countryside location. Policy: Local Development Plan 2 – Policy 41 (Caravan, Camping and Chalet Development), Policy 8 (Special Qualities) and Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park).

6. Informatives

It is recommended that the applicant be informed that dormice are European Protected Species by virtue of their listing under Annex IV of EC Directive 92/43/EEC ('The Habitats Directive'). This Directive has been transposed into British Law under the Conservation of Habitats and Species Regulations 2017. Regulation 9(1) of the 2017 Regulations requires all local planning authorities, in the exercise of all their functions, to have regard to the provisions of the Habitats Directive so far as they might be affected by those functions. Dormice are also protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended).

It is recommended that the applicant and contractors be informed of the possibility of encountering dormice unexpectedly during works. Care should be taken when removing any understory/scrub/woody vegetation. This should be undertaken under the watching brief of a qualified ecologist following good practice guidelines. The provision of a sensitive clearance methodology prior to the commencement of any vegetation clearance works must be a condition of any consent.

In the unlikely event that dormice are encountered on site, works should stop immediately and NRW should be contacted (Natural Resources Wales, General Enquiries: enquiries@naturalresourceswales.gov.uk or 0300 065 3000 Mon-Fri, 8 am - 6 pm) - a licence may then need to be applied. Licences are not automatically granted by virtue of a valid planning consent, and it may be possible that the necessary licence application may be refused.

Lighting

The presented lighting strategy is accepted. The on-site lighting will be installed as per the lighting strategy. Units 6 and 9 will be installed with the recommended Architectural Film in order to reduce the projected artificial light by 50%. The film will be installed in any caravan placed on bases 6 and 9 now and in the future. This is required to maintain the dark zone used by greater horseshoe bats, which are an Annex II species. Should the film not be installed, then the orientation of the caravans will have to be discussed and likely altered.

Invasive species

The received ecology report confirms the presence of one strand of Japanese Knotweed.

Japanese knotweed is a non-native invasive plant species which, once established, is very difficult to get rid of. The Wildlife and Countryside Act 1981 as amended makes it an offence to spread Japanese knotweed. All parts of the plant are considered contaminated waste under Part II of the Environmental Protection Act 1990. Soil contaminated with Japanese knotweed may not be reused and must be disposed of at a licensed landfill site. Natural Resources Wales has produced. The knotweed code of practice A Managing Japanese knotweed on development sites 2009, which gives guidance to anyone needing advice on controlling this species.

No planting is to be undertaken in the proposed ecological area until confirmation of the eradication of the presence of Japanese Knotweed has been received by the local authority. If no plans have been put in place to control this invasive species, then an additional survey will be required to determine the extent of the growth of the Japanese Knotweed.

Bamboo

Bamboo was identified onsite and contained within the ECIA. Whilst bamboo is not classed as a non-native invasive species, types such as *Phyllostachys* act in a similar manner as Japanese knotweed by growing far-reaching rhizomes that can penetrate drains, walls and structure bases. It would be recommended to determine the species on site and take appropriate actions to prevent the spread or remove before significant damage and costs are incurred.

PROW

- The public right of way must not be obstructed and remain available for use at all times.
- The safety of members of the public using the public right of way must be ensured at all times.
- There must be no diminution to the width of the public right of way.
- No building materials should be stored on the public right of way.
- No damage is to be caused to the surface of the public right of way.
- No barriers are to be placed over the public right of way, either of a temporary or permanent nature.

Dwr Cymru

The applicant may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water Industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers' Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

The applicant is also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

The planning permission hereby granted does not extend any rights to carry out any works to the public sewerage or water supply systems without first having obtained the necessary permissions required by the Water Industries Act 1991. Any alterations to existing premises resulting in the creation of additional premises or merging of existing premises must also be constructed so that each is separately connected to the Company's water main and can be separately metered. Please contact our new

connections team on 0800 917 2652 for further information on water & sewerage connections.

In accordance with Planning Policy Wales (Edition 12) and Technical Advice Note 12 (Design), the applicant is advised to take a sustainable approach in considering water supply in new development proposals, including utilising approaches that improve water efficiency and reduce water consumption.

We would recommend that the applicant liaises with the relevant Local Authority Building Control department to discuss their water efficiency requirements.

Sewerage Treatment

No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site.

Water Supply

A water supply can be made available to serve this proposed development. The developer may be required to contribute, under Sections 40 - 41 of the Water Industry Act 1991, towards the provision of new off-site and/or on-site water mains and associated infrastructure. The level of contribution can be calculated upon receipt of detailed site layout plans, which should be sent to the address above.

Our response is based on the information provided by your application. Should the proposal alter during the course of the application process, we kindly request that we are re-consulted and reserve the right to make new representations.

If you have any queries, please contact the undersigned on 0800 917 2652 or via email at developer.services@dwrcymru.com

Surface water

Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres / more than one property, the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

Please see www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-bodysab for more information.