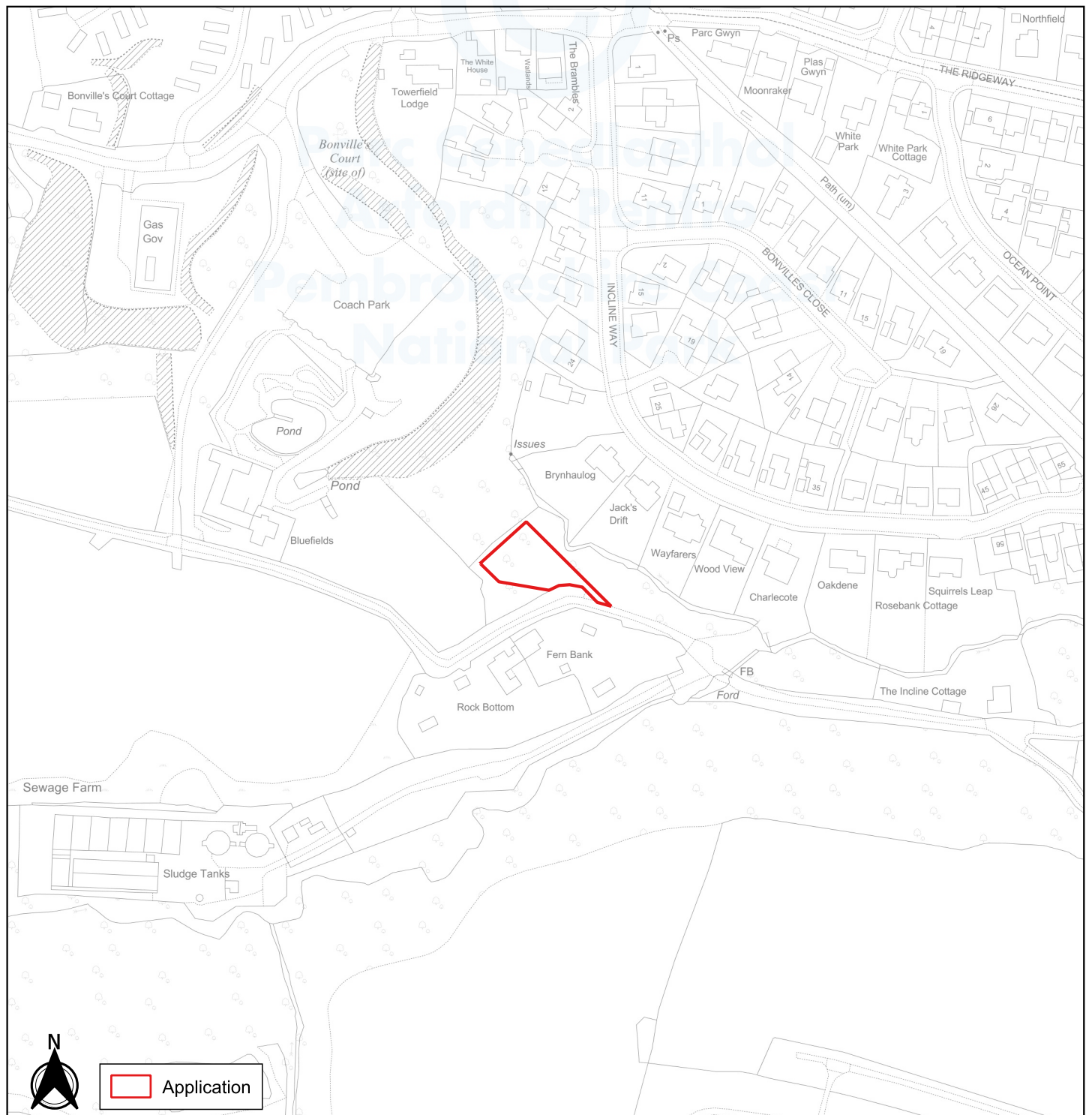
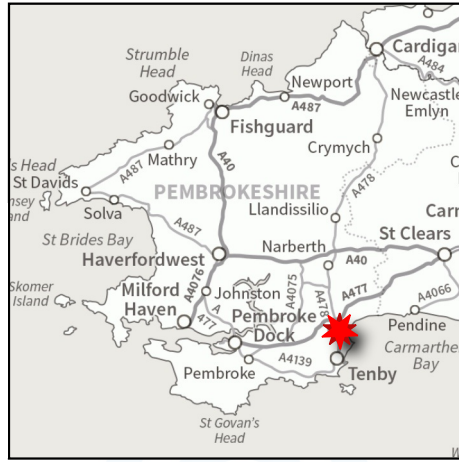




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



Ref No: NP/26/0407/FUL

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

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

Recommendation: Refuse

Summary:

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

The Pembrokeshire Gypsy Traveller Accommodation Assessment 2019 (GTAA) identifies an immediate need for 9 pitches (2019-2024) and a further need for 30 pitches (2025-2033). PCC has granted planning permission for 14 pitches (on private sites) which meets the immediate need numerically and makes a start on providing for the further need. However, the locations of the permissions and the locations previously identified for the need are unlikely to be a perfect match.

PCC's emerging LDP 2, with the latest version taking account of Focussed Changes, allocates land for a further 31 pitches. The existing sites at Kingsmoor and Withybush will be extended to provide a further 11 and 5 pitches respectively – these are both local authority sites. A completely new local authority site is also proposed, south of Monkton Playing Fields, for 15 pitches (but with the potential to provide more than this).

The applicant has existing accommodation and is not currently homeless. Moderate weight has therefore been given in the report below to the existing level of need for Gypsy Traveller accommodation in Pembrokeshire, given the delivery plans from Pembrokeshire County Council. That moderate weight is set against the impact of development on the National Park landscape and special qualities.

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

Some site clearance took place before the application was submitted, making it difficult to establish a reliable ecological baseline. In these circumstances, Planning Policy Wales requires the previous habitat condition to be assumed to have been good.

Additional surveys submitted with this application provide further information on otters and
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badgers. They confirm that otters continue to use the site, and the proposed mitigation includes the creation of an artificial otter holt. The Green Infrastructure Statement also identifies a range of planting and habitat measures, and that in numerical terms, it may be possible to achieve an increase in tree planting and habitat provision.

However, this would not demonstrate compliance with the first stage of the step-wise approach set out in Planning Policy Wales 12, which requires harm to be avoided in the first instance. Nor can the proposal remedy any harm that may have been caused to nesting birds or other species when the clearance took place. The clearance has resulted in the loss of mature and connected habitat, which would take a considerable period to restore.

Securing a genuine and lasting net benefit for biodiversity would require confirmation of the overall planting numbers and robust controls to prevent further clearance in future. As part of the proposed planting lies outside the application site, a legal agreement would be necessary to secure its long-term management. The length of time taken to re-establish maturity and benefit is such that a legal agreement would be necessary to secure the tenure of the land, tie it to the application site and restrict the sale of it independently for 25 years. Although such an agreement could protect and manage the restored habitat in future, it could not reverse any previous harm to species or immediately replace the maturity and connectivity of the habitat that has been lost. A legal agreement has not been pursued because the proposal is unacceptable for separate landscape reasons, both in its immediate setting and in the wider Landscape Character Area.

The report recommends refusal of the application on the basis of a lack of landscape capacity, local landscape impact and impact on the special qualities of the National Park, but in the event of approval a legal agreement would be required.

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

The planning application can be viewed online via: [Citizen Portal Planning](#)

Consultee Responses

- Saundersfoot Community Council – Councillors unanimously determined that the minor alterations (e.g., managed tree planting) do not affect our previous objections (as listed below) and voted unanimously to object to the application. Councillors had made the following comments on 06/11/2025 for consideration by the National Park on a previous application under planning reference NP/25/0536/FUL which was for a similar proposal on the same site
 - a. *Inappropriate Location / Conflicting with National Park Purpose:*

The site is agricultural land with no caravan or other use for over 30 years. This previously unspoilt location is an important part of the landscape setting of the village.

Development would conflict with the statutory purposes of National Parks: conserving and enhancing the area's natural beauty, wildlife, and cultural heritage.

The site is overlooked from Incline Way above and cannot be adequately screened.

Two previous planning applications have been rejected on the site. PCNPA should be consistent with previous decisions.

This is agricultural land, outside the settlement boundary and would conflict with the LDP. Also, the site is too close to the stream, posing a potential pollution risk to the blue-flag beach. Concerns were expressed over sewage system capacity.

b. *Damage to Biodiversity and Wildlife:*

Councillors were frustrated that extensive clearance work had already taken place on the site.

Removing multiple mature trees and apparently disturbing a badger habitat.

There has been no ecological / biodiversity study of the site in its condition prior to the Applicant starting work without permission.

c. *Access*

Access is via a minor road/bridleway and is insufficient for safe vehicular access.

d. *Potential Precedent*

Permission here would be gross overdevelopment, setting a precedent for development literally anywhere throughout the National Park, including the additional land owned by the Applicant adjacent to the application site.

e. *Applicant Has No Local Connection to Saundersfoot Area*

The Applicant lives in Pontypool and claims no connection to the area. There is no provided rationale as to why the Applicant chose a site approximately 100 miles away from their home.

- PCNPA Ecologist – *No objection but further information and updates to submitted documents are required before final recommendations and conditions can be provided.*
A HRA is required and a draft assessment has been submitted to Natural Resources Wales.
- PCNPA Tree and Landscape Specialist - It would be reasonable to refuse the application on ecological and habitat impacts brought about by land clearance, and insufficient site-specific details showing that the application will result in a Net Benefit for Biodiversity; however, it would also be possible to condition the additional information in the form of pre-commencement conditions
- PCNPA Access team – No adverse comments raised and informative note required
- PCC Drainage Engineers – SAB consent required not yet gained; informative note required
- PCC Transportation and Environment – No objection subject to conditions and informative
- NRW – No response received at time of report writing, a verbal update will be provided to Committee.
- Cadw – No response received at time of report writing, a verbal update will be provided to Committee
- Dwr Cymru Welsh Water – Conditional consent and informative - The proposed development would drain to Tenby Wastewater Treatment Works, which is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance. However, a scheme is planned for completion by 31st December 2026 – no occupation possible before works completed.
- The Coal Authority – We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make. However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.
- Wales and West Utilities – No response received at time of report writing, a verbal update will be provided to Committee.
- Western Power – No response received at time of report writing, a verbal update will be provided to Committee.

Public Response

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

A significant number of representations have been received all of which raise objections to the proposal. One response was from a planning agent who wrote on behalf of a group of local residents. The concerns/objections within the representations received are summarised below:

a. Landscape

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

b. Need

- No evidence of need for Gypsy/Traveller pitches in the National Park
- Whilst there is a need for Gypsy Traveller accommodation in the wider Pembrokeshire County Area, development in the countryside in the National Park should only be considered if no other option is demonstrated to show why the applicant needs to move specifically to this site.
- There is already an existing site in Kilgetty – it is unnecessary to create an additional facility within a protected National Park at the cost of environmental degradation.
- The applicant resides in Pontypool – Torfaen Council has sufficient pitches in this area to meet the forecast demand in excess of the next 5 years.

c. Highway safety/Access

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

d. Residential Amenity Impacts

- Loss of privacy to private rear amenity areas of properties on Incline Way and internal habitable rooms.
- Dayroom looking directly into bedroom windows of houses behind
- Properties on Incline Way all overlook the proposed development

- Concerns over noise and light pollution

e. Ecology

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

f. Drainage

- Concern that the connection point is to a pressurised main and that Welsh Water have objected to similar other connections.
- Concern that a large amount of hardstanding has been laid and could cause surface water flooding – no drainage calculations submitted with the application. Percolation information should be submitted prior to determination, as otherwise, the soakaway on the site plan may not be appropriate.
- No clarity on the water supply source.
- Concerns that mistakes have been made by applicant/Dwr Cymru not understanding the postcode (*Officer comment: It is worth noting that applications are assessed based on the plans submitted, not the postcode*)

g. Policy/Statutory considerations

- Precedent concerns
- Concern that the applicant has not appealed the previous decision, and questions over why he has been able to resubmit another application and perception of the process being deliberately drawn out through non appeal of previous refusals.
- Impact on the statutory duty of the National Park to conserve and enhance natural beauty, wildlife and cultural heritage.
- Location outside settlement boundary – no justification for this exception
- The key landscape characteristics for the Saundersfoot LCA 1, including preserving farmland and woodland patches, which this proposal would threaten.
- None of the appeal decisions submitted by the agent for the application relates to a site within a National Park, and as this important statutory designation does apply, they have little relevance to the application site.
- Breaching of a legal agreement to remove all caravans from the site

h. Other matters

- Capacity on site for further pitches in future – risk of increased visual intrusion
- Suggestion of a public ballot to determine the acceptability of the proposal.

- Personal distress caused by the clearance of the site to neighbours as a result of the loss of wildlife and habitat
- Multiple residents of Incline Way since 1984 do not recall any caravans on the site since 1993.
- Similar applications were refused in May 2025 and January 2026, and nothing new has been brought to the table, so regard the resubmission as somewhat cynical
- Property value
- Community cohesion
- Applicants' history of non-compliance
- Questions over the provision of electricity and the delivery of gas/oil on site.
- Questions about why the personal information provided with the application is confidential
- Stress caused to residents are part of the continued development of the site
- Noise of construction
- Requests to carry forward earlier objections

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

Policies considered

National Policy

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

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

Welsh Government Circulars

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

Technical Advice Notes

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

www.gov.wales/technical-advice-notes

- TAN 02 – Planning and Affordable Housing
- TAN 05 – Nature Conservation and Planning
- TAN 06 – Planning for Sustainable Rural Communities
- TAN 10 – Tree Preservation Orders
- TAN 12 - Design
- TAN 15 – Development and Flood Risk
- TAN 18 – Transport
- TAN 24 – The Historic Environment

Local Development Plan 2 (Adopted September 2020)

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

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park) Page 31 of 83

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- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 41 (Caravan, Camping and Chalet Development)
- Policy 53 (Gypsy Traveller and Showpeople Sites)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

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

LDP2 Supplementary Planning Guidance

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

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

Site Constraints

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

Officer's Appraisal

1. Site and Proposed Development

The site is located to the west of Saundersfoot and falls within Landscape Character Area 1 – Saundersfoot Settled Coast. The site is also immediately adjacent to the Centre Boundary. Seven properties are located in close proximity to the application site, with five of them to the north-east within Incline Way, whose rear gardens back onto the site, situated at a higher level than the application site and looking down towards it. Two further adjacent properties are located on the opposite side of Moreton Lane, which also provides access to the application site, with a sewage treatment works located further to the south-west. The application site covers approximately 1013 square metres and slopes gently from the north-west to the south-east. Moreton Lane also forms a Bridleway (42/44), with access from Saundersfoot to Valley Road and further west to the A478.

The current proposal seeks approval for a development consisting of a change of use of land for residential use as a traveller site incorporating one static caravan, one touring caravan and a detached day/utility room. The current description references ecological enhancements and notes that the development is partly retrospective. Whilst the extent of the retrospective nature has varied during the application period with a static caravan being removed and then returned to the site, the overall description at the time of the report being written is still considered to be accurate.

2. Relevant Planning History

Planning applications

- NP/25/0536/FUL - The creation of one traveller site incorporating one static caravan, one touring caravan, one day/utility room & ecological enhancements & woodland creation on surrounding land (partly retrospective) – Refused by Committee 28 January 2026
- NP/24/0638/FUL – The creation of one traveller site incorporating one static caravan, one touring caravan, a day/utility room and ecological enhancements (partially retrospective) - Refused by Committee 21 May 2025
- NP/320/851 – Outline application for a bungalow was refused in September 1985
- NP/29/94 – Outline application for a detached dwelling was refused in February 1994

Pre-applications

- Pre-application enquiry PA/21/0114 –Proposed 2-storey dwelling and detached 3-car garage – Response sent with recommendation of refusal

Relevant Planning Enforcement Action

- EC22/0091 - Alleged clearing of land for access - This case was opened on 7th July 2022 following information from a neighbour that the land was being gradually cleared to provide access and to store a caravan. A pre-application was received regarding a property on the land. The landowner was informed that approval was unlikely.
- EC24/0029 - Alleged unauthorised siting of caravan - This case was opened on 7th March 2024 following a report that a caravan was sited on the land and that land clearance had taken place (new landowner since the previous enforcement case). Further reports informed us that drainage was being installed.
- Temporary Stop Notice issued on 19th July 2024, requiring the landowner to: Ceasing the use of the land for the siting of a mobile home for residential and/or storage purposes; and removing the drainage pipes and any associated apparatus present from the land.
- Enforcement Notice was issued on 16th September 2024, containing the same information as the Temporary Stop Notice.
- Enforcement Appeal, starting on 26.09.2024, was lodged on Ground G only, requesting additional time for compliance.
- Appeal Decision on 20/03/2025 - Appeal Dismissed and EN upheld
- Enforcement Case remains open. A legal undertaking was signed in October 2025 agreeing to remove the caravan once the then active planning application was refused and any rights to appeal expired.
- The static caravan and timber storage shed were removed from the site to secure compliance with the enforcement notice. Officers visited the site on the 27th August 2026 to confirm the static caravan and timber storage shed had been removed.
- A report was brought to Member on the 2nd September noting that following the ongoing breach, the landowner had not chosen to Appeal either previously refused application and that the site had been cleared in line with the Enforcement Notice.

and that this was confirmed by Officers visiting. This was noted as the caravan was removed immediately prior to the meeting.

- EC26/0126 - It is also noted that a static caravan was again brought onto the site on the 30th September 2026 and was observed by Officers being offloaded within the site. The applicant purports that this was in accordance with permitted development/ancillary rights, although the Authority had advised in writing prior to its installation that it did not consider that a static caravan would fall within permitted development rights and advised the owner that any reliance on such rights should be tested via a certificate of proposed lawful use given the enforcement history on site. A new enforcement case has been opened in relation to this, and the Authority is considering the appropriate action. The outcome of this application is relevant to that.

3. Key Issues

The application raises the following planning matters:

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

3.1 Policy and Principle of Development

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

6. The Well-being of Future Generations (Wales) Act 2015 sets well-being goals which include: 'a Wales of cohesive communities' and 'a Wales of vibrant culture and thriving Welsh language'
7. Section 149 of the Equality Act 2010 prohibits racial discrimination by planning authorities in carrying out their planning functions. In addition, most public authorities, including local authorities, have a general duty under the 2010 Act to actively seek to eliminate unlawful discrimination, to advance equality of opportunity, and to foster good race relations in all they do.
8. This application seeks permission, partly in retrospect, for a gypsy traveller site. The site lies outside the settlement boundary for Saundersfoot, which is designated a Local Centre in the Local Development Plan 2 (LDP2). The location is therefore classified as Countryside, where development must be strictly controlled.
9. The site also falls within Landscape Character Area 1 – Saundersfoot Settled Coast. The site is immediately adjacent to the Centre Boundary. Seven properties are located near the application site; five are to the north-east within Incline Way and have their rear gardens backing onto the site. Two further adjacent properties are on the opposite side of Moreton Lane, which also provides access to the application site, and a sewage treatment works is located further to the south-west. The application site covers approximately 1,013 square metres and slopes gently from the north-west to the south-east. Moreton Lane also forms a Bridleway (42/44) with access from Saundersfoot to Valley Road and further west to the A478 road.
10. Saundersfoot Community Council (SSC) objects to the current application on the grounds that the location is inappropriate and conflicts with National Park Purposes. They indicate that the site is agricultural land and that there has been no caravan or other alternative use in over 30 years. SSC indicate that they consider the site to have been previously unspoilt, which is an important part of the village's landscape setting.
11. SSC claim that the development will conflict with the statutory purpose of the National Park, which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. In addition, they indicate that the site falls outside the settlement boundary, which conflicts with LDP2; that two previous planning applications have been refused on this site; and that the Authority should be consistent with previous decisions.
12. *Definition of Gypsies and Travellers*
Section 108 of the Housing (Wales) Act 2014 defines Gypsies and Travellers as:
 - a) Persons of a nomadic habit of life, whatever their race or origin, including –
 - (i) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and
 - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such), and
 - b) All other persons with a cultural tradition of nomadism or of living in a mobile home.
13. Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites' (June 2018) advises that members of the Gypsy and Traveller community do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers (paragraph 3).

14. The submitted information provided in the supporting Planning Statement to the application states that the applicant belongs to a long-standing Romany Gypsy family, and generations have lived a traditional and cultural lifestyle, living in caravans all their lives. The supporting statement explains that the applicant and his partner currently reside in an overcrowded Traveller site in Pontypool, where living conditions are poor. It states that current accommodation is 'totally unsatisfactory as it is being rented and is bricks and mortar'. The agent also submitted a separate statement indicating that there are no available public traveller sites in South West Wales. The agent stated that the applicant knows the Saundersfoot area well and owns this land, so it is a logical and most sustainable option to make this his home. The Statement also indicates that PCC has nothing to offer regarding the current public sites available in the Pembrokeshire area.
15. Following the determination of a planning application under planning reference NP/24/0638/FUL, the Authority received correspondence from a third party stating that they had long-standing knowledge of the applicant and that he was not a Gypsy and had no Gypsy Traveller heritage. During the course of the previous application under planning reference NP/25/0536/FUL, a further third party wrote to the Authority stating that they are a member of the Gypsy Traveller community and that they do not believe the applicant is a member of this community, but instead an individual who undertakes work for the community on occasion. The Authority requested information from the Agent acting on behalf of the applicant regarding the applicant's status. Supporting information in the form of a letter from Travelling Ahead: Gypsy, Roma and Traveller Advice and Advocacy Service has been provided alongside a statement from the applicant, including personal information about his history. Travelling Ahead is an advice and advocacy service funded by the Welsh Government. The letter notes that the writer, who is a staff member with Travelling Ahead, considers the applicant and his family to fall within the definition of a Gypsy Traveller and that the applicant currently resides in a rented bungalow on a Traveller's site near Pontypool. Officers of the Authority consider that sufficient evidence has been provided to indicate that the applicant's Romany Gypsy family connection and his lifestyle fall within the definition of Gypsies in paragraph 2 of Circular 005/2018.
16. LDP2, Policy 7 'Countryside' seeks to strictly control development outside the identified Centres. Policy 7 sets out the types of development that are acceptable, in principle. Criterion (I) supports, in principle, the need for a Gypsy and Traveller site in a countryside location, subject to the criteria in Policy 53. LDP 2, Policy 53 'Gypsy, Traveller and Showpeople Sites' sets out a range of criteria for assessing proposals for new sites.

Gypsy and Traveller Accommodation Needs in Pembrokeshire

17. LDP 2, Policy 53, criterion a) requires demonstrating that no suitable pitches are available within existing authorised sites or land within existing settlement limits. Information from Pembrokeshire County Council (PCC) Housing Department (January 2026) states that Pembrokeshire has 82 local authority-managed pitches. Three void pitches are in the north of the County, all awaiting reconfiguration and remaining vacant until works are completed. 1 pitch in the south of the County is also void, awaiting major works. 3 further pitches in the south are currently closed and not counted in the 82 figures. There are 19 people on the pitch waiting list. All of whom are waiting for a pitch in the south area of the County. The Gypsy and Traveller Accommodation Assessment (GTAA) for Pembrokeshire, which includes the National Park, was prepared in 2019 and approved by the Welsh Government (WG) on 24

May 2024^[1]. The GTAA 2019 identified an immediate need for nine residential pitches from 2019 to 2024, with a net additional need of 30 pitches from 2025 to 2033. The locations identified by people in need are generally in the south of the county, with Haverfordwest the farthest to the north. There is no specific identified need for pitches in the National Park. There is also a further planning application which is currently undetermined, at Greenwells, Coshaston Bridge, 25/0588/PA, proposing 2 Gypsy and Traveller pitches. This is a retrospective s.73A application.

18. The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and that the identified need for pitches is met. Section 101 of the Housing (Wales) Act 2014 requires the local authority to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to its area. In Pembrokeshire, Pembrokeshire County Council holds this duty as the local housing authority.
19. The Housing (Wales) Act 2014 requires the local housing authority to carry out a GTAA every 5 years. The local housing authority (PCC) was required to undertake the GTAA in 2024 but has been advised by the WG to delay undertaking a new GTAA until revised guidance has been published by the WG.
20. Information from PCC has confirmed that the Pembrokeshire Gypsy Traveller Accommodation Assessment 2019 (GTAA) identified an immediate need for nine pitches between 2019 and 2024, which has been met, and a further need for 30 pitches between 2025 and 2033. PCC has granted planning permission for 14 pitches on private sites which meets the 2019 GTAA identified need numerically and begins to make provision for further need. PCC's emerging LDP2, latest version taking account of Focussed Changes, allocates land for a further 31 pitches. The existing sites at Kingsmoor and Withybush will be extended to provide a further 11 and 5 pitches respectively – these are both local authority sites. A completely new local authority site is also proposed, south of Monkton Playing Fields, for 15 pitches (but with the potential to provide more than this). PCC's LDP2 has hearings scheduled for November 2026 and therefore there is a strong likelihood that the Plan will be adopted in the next year, with a greater provision identified within it than the identified GTAA need.
21. The adopted LDP2 for the National Park does not identify any site allocations for Gypsy and Traveller pitches, as no need was identified in the 2015 Gypsy Traveller Accommodation Need Assessment (GTANA) in the Pembrokeshire Coast National Park. The GTAA 2019 did not identify a need for pitches within the National Park. LDP2, policy 53 'Gypsy, Traveller and Showpeople Sites' sets out a criteria-based policy for assessing applications for new Gypsy, Traveller and Showpeople sites.

GN 24 Gypsy and Traveller Site Allocations

22. The Gypsy and Traveller caravan count from Jan 2025¹ recorded Pembrokeshire as having 178 caravans, of which 171 are authorised. Table 1 recorded 112 caravans on authorised sites run by the local authority and 59 caravans on authorised private rented sites. Table 2 records five authorised local authority sites in Pembrokeshire and 24 authorised private sites. This is the highest number of authorised sites in

¹ <https://www.gov.wales/sites/default/files/statistics-and-research/2025-04/gypsy-and-traveller-caravan-count-january-2025.ods>

Wales. Table 3 shows that the local authority provides 80 occupied residential pitches and three vacant residential pitches.

23. Some representations to the application have raised concerns that the applicant is not local and has not demonstrated a local connection sufficiently. Representations have also suggested that there is adequate provision in Torfaen Council to meet any identified Gypsy Traveller accommodation need in that area. The Authority has assessed these points, which are addressed below.
24. Case law has shown that there is no requirement for the applicant to prove a need to live specifically on the proposed site, or that no other site is available. The applicant is also not required to demonstrate a local connection or need to reside in the proposed location (see Circular 005/2018, paragraph 65). The supporting statement indicates that the applicant and family currently reside at Glascoed, on the outskirts of Pontypool. Whilst this does not preclude them from seeking an alternative site, there is no specific lack of accommodation for the applicant and his family, nor are they currently homeless. The applicant's cultural preference for a caravan is noted but not considered an urgent need.
25. In an appeal against an enforcement notice issued by the Authority for the use of the site the Inspector wrote: "In this case, it is clear that the appellant currently lives on a site known as Glascoed on the outskirts of Pontypool and following the purchase of the appeal site in October 2023 he intends for the appeal site to become his future home. The Council's evidence also indicates that the appellant does not currently live on the appeal site. As such, the requirements of the Notice to cease the use of the land for residential purposes would not displace the appellant or make him homeless and in need of finding alternative accommodation." (paragraph 7). The appeal was dismissed. (Appeal reference CAS-03683-C2YOL6).
26. Nothing appears to have changed significantly in that regard. Therefore, it is considered that whilst there is an outstanding need for Gypsy and Traveller pitches in Pembrokeshire, the GTAA 2019 did not identify any specific need within the National Park. The immediate, short-term need has been met, and the need for 2025 to 2033 is being addressed in full and with some overprovision through allocations in PCC's LDP2, which is scheduled for LDP Examination hearings in November 2026. As such, Officers recommend that moderate weight should be attached to the level of need for a site, given the likely adoption of a Plan to deliver to meet this need shortly.
27. The Torfaen Gypsy and Traveller Accommodation Assessment identifies the level of need until 31 March 2033 and was approved by the Welsh Government in July 2024. The GTAA identifies that there are currently 54 Gypsy and Traveller households located on five sites in Torfaen. The Torfaen GTAA estimates an increase to 65 households (an increase of 11 households) by 2025 and an increase to 79 households (an increase of 24 households) by 2033. The GTAA notes that, taking into account permanent pitches likely to become vacant in the future, and with 21 permitted pitches yet to be built at the Council's Lower Shepherd's Hill site, the immediate need can be met. Unmet need for seven new permanent pitches up to 2033 may be met through permission for 10 new permanent pitches in the current LDP.

28. Whilst there is evidence to show that there is accommodation capacity in Torfaen, Gypsies and Travellers are nomadic, and the local planning authority Page 38 of 83
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determine applications for development from anyone who submits them. As stated in Circular 005/2018, Planning for Gypsy, Traveller and Showpeople Sites states:

“Planning authorities should not refuse an application because the applicant has no local connection” (paragraph 65).

29. LDP2 Policy 53, criterion b) requires the site to be well located to serve the needs of Gypsy, Travellers or Showpeople, including the need to access local services. The proposed site is adjacent to the local centre of Saundersfoot, which offers a range of services, including education and health facilities (a primary school and a doctor's surgery), as well as access to shops. The site is therefore considered to be well located in accordance with criterion b).
30. LDP2 Policy 53, criterion c) permits proposals where the site has good access to a public road which is safe and direct. The site is accessed via a non-classified road called Moreton Lane. The Highways Authority has been consulted on the road's suitability for access. It must also be noted that the Development Advice Maps show sections of Moreton Lane within Flood Zone C2. The Flood Map for Planning also shows sections of Moreton Lane within Flood Zone 3 (rivers and sea).
31. The HA has been made aware that a small section of Moreton Lane is subject to flood risk. An alternative access is available via Moreton Lane from the A478, which avoids the flood route. This alternative route, however, is narrow, whilst the lane is suitable for smaller vehicles along its entire length, the HA is unable to ascertain if the full length of the lane is suitable for larger/emergency vehicles therefore, it has recommended a swept path analysis will be required and could be achieved through imposition of a condition to ensure the secondary route into the site is suitable for use. Whether the imposition of such a condition was suitable or alternatively whether the provision of further information would potentially be needed to be considered if members were minded to approve but as the application is not being supported, that matter is not being taken forward at this time by Officers. Either way, criterion c) appears to be capable of resolution.
32. LDP2 Policy 53, criterion d) supports development where the site is suitable for the development and on-site services and facilities can be adequately provided. Circular 005/2018 states, “Gypsies and Travellers should always consult planning authorities on planning matters before buying land on which they intend to establish any caravan site, for which planning permission will almost always be required (paragraph 62). The applicants did not contact the local planning authority prior to the purchase of the site.
33. In accordance with Planning Policy Wales (Edition 12) and the Environment (Wales) Act 2016, every development must make a positive, net benefit for biodiversity. The Planning Ecologist has been consulted on the specific effects of the site clearance and on any mitigation or restoration measures to repair damaged habitats or disturbed species, as detailed in the report below. All development must deliver a net benefit to biodiversity and ecosystem resilience relative to the baseline state, prior to clearance.
34. Whilst it is considered theoretically possible to deliver a net benefit for biodiversity in terms of numerical replacement tree planting, wider impacts created by clearance would require long term certainty of management of the area in a sensitive manner which has not been provided to the Authority in the current statements.

considered this could potentially be achieved in the longer term by a legal agreement, but this is not currently in place. Therefore, at present there is insufficient certainty in the long term that a net benefit for biodiversity could be achieved on the application site and immediately adjoining land, but that is capable of resolution by way of imposition of a long-term habitats and landscape management plan, secured via a legal agreement.

35. LDP2 Policy 53, criterion f) states the proposal should not cause significant visual intrusion and should be sensitively sited in the landscape with satisfactory landscaping provided. Circular 005/2018 sets out a list that should be considered when identifying new Gypsy and Traveller sites in a development plan. The list includes “regard for areas designated as being of international, national and local importance for biodiversity and landscape.” (paragraph 37). The proposed development is considered to result in visual intrusion within the local landscape, particularly when viewed from immediate adjoining viewpoints. It is recognised that long term landscaping could mitigate this to some extent, however the introduction of the large static caravan, one tourer, utility block and associated paraphernalia are considered to result in a built form which would remain obtrusive in this setting.
36. Overall, Officers consider that whilst some elements of Policy 53 (Gypsy, Traveller and Showpeople Sites) are met by the proposal, or are capable of being met, the proposal has not demonstrated that it meets criterion d) or criterion f) based on its likely visual intrusion and lack of information on long term maintenance of proposed landscaping and lack of details on overall tree planting numbers. These points are discussed in further detail below.

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

37. A number of representations have raised concerns about potential impacts on the landscape, and which may take place if planning permission is granted, raising concerns that these would impact negatively on the Special Qualities of the National Park.
38. The National Park is a statutory landscape designation which has as its statutory purposes to conserve and enhance the national beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of the special qualities. Where there is a conflict between the two purposes, greater weight shall be given to the first purpose. The Authority also has a duty to seek to foster the economic and social well-being of local communities.
39. LDP2 Policy 8 ‘Special Qualities’ requires the special qualities of the National Park to be conserved and enhanced. The National Park’s Partnership Plan², approved on 26 March 2025, updates the special qualities of the National Park. The special qualities relevant to the application are:
 - Landscapes and seascapes of exceptional diversity and quality
 - Rich and varied wildlife
 - Rich heritage and culture
 - Historic patterns of settlement and buildings
 - Historic patterns of land use and traditional boundaries
 - A comprehensive network of Rights of Way

² [1-Partnership-Plan.pdf](#)

- The combination of special qualities
 - The sense of community and stewardship
40. Policy 8 (Special Qualities) includes criterion g, which specifies that species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value.
 41. Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.
 42. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
 43. The Authority's adopted Supplementary Planning Guidance (SPG) on 'Caravan, Camping and Chalet' development was prepared to support LDP2 Policy 41 'Caravan, Camping and Chalet Development'. Officers consider that significant weight can be attached to this SPG as it provides a systematic assessment of the capacity of landscape character areas to accommodate new caravan, camping and chalet developments.
 44. SPG Landscape Character Area (LCA) 1 'Saundersfoot Settled Coast' has a medium sensitivity to small static sites, with no capacity for new sites. The assessment for LCA 1 (page 32) details the characteristics that make the area sensitive to development. The following characteristics are relevant to this application:
 - Irregular small fields in places
 - Remaining rural green gaps between settlements
 - The value of the area lies in its National Park status.
 45. The assessment identifies that "the area has a significant amount of caravan and camping development both on the coastal edge and inland, especially to the southwest." The summary of capacity states: "The area is at capacity because cumulatively the existing sites are having an adverse effect on the landscape character. The gaps between developments in places, especially the southwest, are narrow and need to be retained to maintain a sense of a rural character." There is no capacity for new sites as there are many existing sites which are already cumulatively adversely affecting the landscape character. The map of LCA 1 (page 34) shows a number of existing static caravan sites in the LCA, with Bonvilles Court Country Park approximately 200 metres to the north of the proposed site and Griffithston Farm, approximately 200 metres to the south of the proposed site.
 46. A site visit has been carried out by Officers for previous applications and revisited again for this application. The proposed site is adjacent to a public right of way (PROW) (SP42/44) and there is boundary vegetation present which may mitigate some landscape impact when viewed from the adjacent PROW during the summer months. However, reduced vegetation during winter months would make the site more visible from the PROW and adjacent properties within the Incline Way residential estate. It would be possible to introduce enhanced buffer planting which might reduce localised landscape impact to some extent. The proposed static caravan and associated buildings/structures are moderate in scale but contrast in colour from the surrounding landscape. Notwithstanding the potential for mitigation, it

is considered that the proposal will likely have an unacceptable adverse effect on the National Park landscape, particularly for walkers on the PROW, and is therefore contrary to Policy 41.

47. The proposed development will have a significant visual impact on the adjacent landscape, with the current site clearance opening up the site when viewed from the adjacent access track that also forms a Public Right of Way (PROW), which is not capable of mitigation, and also when viewed from the adjacent neighbouring properties, which form part of the Incline Way development. Given the existing topography, landscaping, and other built structures, the impact on the wider landscape will be more limited.
48. The proposed site is within LCA 1, which is considered to be at capacity. Table 4 of the SPG provides a definition for no capacity / at capacity and states that the area is unable to accommodate further / any units as it has a high or high/medium sensitivity and/or it has substantial caravan/chalet/camping development which already significantly cumulatively adversely affects character and conflicts with the primary purpose of the National Park.
49. Some objections raise the point that there will likely be a proliferation of other items on the site if permission is granted.
50. The supporting statement states that the applicant has an established civil engineering business and remains the sole operator with a licence to park his lorry and machinery on a site in Cwmbran. The agent has submitted a statement which explains that: *'Only 2 private cars would be used on site and no industrial / business vehicles. The client already has a rented yard or land where he stores business-related vehicles/materials. In this respect, however, the size of this current application site would prohibit the storage/siting of any associated business vehicles.'*
51. Paragraph 44 of Circular 005/2018 states that "where Gypsies and Travellers require additional space for work-related activities, they should be encouraged to pursue private leasing agreements for nearby space and/or facilities." The Welsh Government's guidance, Designing Gypsy and Traveller Sites in Wales, provides guidance on how sites should be designed.
52. The concern about proliferation of other items is therefore not given any weight.
53. Overall, officers consider that the development of a traveller site incorporating one static caravan, one touring caravan, a day/utility room in an LCA which has no further capacity to accommodate new caravan development would have an unacceptable landscape impact on the National Park and would therefore be contrary to LDP2 Policies 1, 8, 14 and 41.

3.3 Amenity and Privacy

54. 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.

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

3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping

Biodiversity impacts

- 60. PPW12, TAN5 and LDP2 Policy 11 (Nationally Protected Sites and Species) requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.
- 61. To comply with Planning Policy Wales 12 (2024) and the Environment (Wales) Act 2016, planning authorities are expected to ensure every development positively contributes to biodiversity. In addition, PPW12 section 6.4.16 sets out that 'All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if biodiversity value is maintained, there must still be a proactive process to identify and secure enhancements through the design and implementation of the development.

62. As part of this application additional ecological surveys have been provided from March 2026 which confirm that otters currently utilise the site and continue to do so. However, it remains unclear whether the earlier clearance of scrub and vegetation affected any badger setts, otter holts or other species such as nesting birds, which would have been a particular risk in March. The step wise approach to Green Infrastructure seeks to avoid harm in the first instance – this has evidently not been achieved on this site.

Net Benefit for Biodiversity and Green Infrastructure

63. To comply with Planning Policy Wales 12 (2024) and the *Environment (Wales) Act 2016*, planning authorities are expected to ensure every development positively contributes to biodiversity and that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well being.
64. 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.
65. It also states that a green infrastructure statement should be submitted with all planning applications and that the green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach has been applied.
66. Pre-emptive site clearance was undertaken prior to the submission and determination of the application. As a result, the Local Planning Authority (LPA) is unable to establish with certainty the baseline ecological conditions that existed on the site before the clearance works took place. The applicant has stated that some clearance activities were undertaken by third parties. It is not accepted that it is only the applicant's clearance activities that are relevant. However, the LPA holds photographic evidence and enforcement records indicating that the applicant undertook site clearance works in March 2024. Clearance during this period has the potential to affect nesting birds and other protected or priority species, including badgers. The extent of any such impacts cannot now be determined due to the absence of a verified pre-clearance ecological baseline. Regardless of which party undertook what level of clearance, Section 6.4.16 of PPW12 notes that:
'Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.'
67. Consequently, irrespective of who carried out the clearance works, the LPA is required to assess the proposal on the basis that the site previously supported a good quality habitat resource.
68. The greater site that has undergone clearance is 0.272 hectares, so using 1600 broadleaf trees per hectare would require planting of approximately 435 trees for the broader landholding area. The application site is 0.1013 hectares, so using 1600 broadleaf trees per hectare, this would require approximately 162 trees to be established on the application site. This could incorporate native scrub species within the site, focused on structural planting to ensure tree cover and scrub habitat is implemented. Drawing 02c notes that 198 trees will be planted in 'Proposed managed tree planting zone'; which would suggest mitigation planting beyond what

would be required for the development site area based on PPW12 woodland and shelterbelt. recommendations.

69. A number of third-party objections have also raised the question as to whether the proposed planting is considered to be sufficient to restore the site to pre-clearance levels.
70. Information from the Authority's GIS Phase 1 habitat data demonstrates that the site was, prior to clearance, predominantly categorised as dense scrub, which the Tree and Landscape Specialist has identified as likely to have been a woodland edge feature related to the adjacent protected woodland to the north.
71. In numerical terms, it may be possible to deliver a net benefit for biodiversity and, through a comprehensive long-term management plan, to restore habitat connectivity over time. However, such measures would take a long time to establish and would not reverse the harm arising from the previous site clearance or immediately replace the maturity, complexity and ecological function of the vegetation that has been lost other than in the longer term. The extent of that residual harm in the short/medium term is difficult to quantify because of the lack of baseline data, and the proposal has not demonstrated compliance with the step-wise approach in Planning Policy Wales, which requires harm to be avoided in the first instance. Although the Authority acknowledges that part of the site was cleared by previous owners, the absence of a reliable pre-clearance baseline makes it difficult to determine the nature and extent of the overall loss.
72. Although restoration may be achievable over time, this would require a legal agreement securing the land outlined in blue and its management in accordance with a comprehensive 25-year management plan, to enable the habitat to re-establish and attain maturity. It would be wrong to attribute the benefits of site restoration as a material consideration in favour of the application. Such benefits could be achieved naturally over time as well. The ability to achieve restoration is therefore seen as neutral in the planning balance
73. Restoration of the site to its assumed baseline condition, together with the provision of appropriate mitigation, would require a defined level of habitat creation and tree planting. Furthermore, in order to secure the delivery of a net benefit for biodiversity, additional planting and habitat enhancement measures would be necessary. These matters could be secured by way of an appropriately worded legal agreement requiring imposition of a long-term landscape and ecology management plan. This could also impose requirements to secure the relocation of the close-boarded fence where necessary in order to improve the situation for otters and badgers and to ensure the protection of tree root protection areas during construction and subsequent site use.
74. Officers are also of the view that the legal agreement would be necessary to tie the areas of the applicant's land beyond the red line boundary to the site to provide long term certainty to ensure restoration of all of the cleared habitats.
75. Notwithstanding these issues, it is evident that a measurable net benefit for biodiversity could be achieved through the implementation of a suitably detailed planting and habitat management scheme. However, the clearance of established

vegetation has resulted in the loss of mature habitat, its diversity and connectivity and will have caused significant disturbance to species and ecological networks.

76. Although habitat connectivity, structure and ecological function can be restored in the longer term, the maturity and complexity of the habitats that have been lost will take a considerable period to re-establish.
77. Overall, the Authority is satisfied that, subject to the imposition of robust planning conditions and a section 106 legal agreement to secure them, mitigation measures and biodiversity enhancements could be secured such that the site would, in numerical terms, achieve both restoration and a net benefit for biodiversity when assessed against the assumed baseline condition.
78. It should however be noted that there would be residual harm in the short to medium term. It would therefore be wrong to attribute positive weight to any net benefit to biodiversity that could be achieved in the longer term. At best, the biodiversity implications should be considered as neutral rather than as weighing in favour of the development.
79. While it is possible that individual species or habitat features were harmed during the site clearance works, the extent of any such harm cannot now be established and the site clearance means that it is not possible for the application to comply with the step-wise approach to development established by Planning Policy Wales Edition 12.
80. On balance, the LPA considers that appropriate mitigation, habitat restoration and biodiversity enhancement measures could, over time, compensate for the ecological effects of the clearance and deliver a net biodiversity benefit. To properly have certainty of this and prevent further clearance in the future however, the Authority would wish to see a legal agreement in place particularly to ensure that mitigation measures were delivered and the land outside the application site area was tied to the application site and under secure control.

Habitats Regulation Assessment

81. The development site is located five metres from a watercourse that is hydrologically connected to the Carmarthen Bay and Estuaries Special Area of Conservation (SAC). One of the qualifying features of the SAC is otter. Given the confirmed presence of otters on the adjacent watercourse, this application will require an HRA to be undertaken.

Under the Conservation of Habitats and Species Regulations 2017 (as amended), the competent authority is required to undertake an HRA only where it is minded to grant consent to a plan or project that may have a likely significant effect on a European site (Regulation 63). As the application is recommended for refusal, there is no pathway for authorising effects on the designated site. However, the recommendation is only that and Members of the Development Management Committee (DMC) might be minded to approve the application contrary to this recommendation. Therefore, the Authority's Ecologist has undertaken an HRA, which concludes that there is no impact on the integrity of the SAC and this has now been sent to NRW for sign-off before the application is presented to the DMC. A verbal update on the NRW response will be provided to Committee.

3.5 Access and Parking

82. Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that support improved traffic and parking management. Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
83. SSC has raised concerns about the access, which is via a minor road/bridleway, and they consider it insufficient for safe vehicle access.
84. The Authority's Access and Rights of Way team have indicated that the access to the proposed site will be via a registered public right of way (Bridleway SP42/44), which is known as Moreton Lane. The public has the right of passage on foot, by bicycle, and on horseback along this route. It is considered that the proposed number of additional vehicular movements that can be expected to be generated by the proposed development is not significant and that the section of the bridleway to be used as a private access will be relatively short in length (approx. 60 metres). This stretch of the bridleway is considered to have sufficient width, verges and good sight lines to enable public and private traffic to safely coexist.
85. Therefore, Officers have no objection in respect of the proposed development and the adjacent public right of way, subject to an informative note to be added to any consent granted to cover criteria which the developers will need to be aware of during the construction phase of the proposed development.
86. Pembrokeshire County Council Highways officers have been consulted. The proposed expanded site plan (DWG No. 03c) indicates that site access will be located approximately 30m west of the private entrance track off the adjacent Public Right-of-Way (PROW), which provides access to two private dwellings and a Water Treatment Site. Officers consider the verge widths on both sides of the access adequate, providing acceptable sight lines.
87. It is considered that, as part of the proposed development, no site boundary fences must be placed within 2metres of the PROW near the site access to maintain good visibility onto the PROW for egressing vehicles. The proposed site plan (DWG No. 04d) and Design and Access Statement (DAS) state that the site access has been improved and laid with rolled permeable stone; this must be laid for a minimum of 10m. In addition, any gates should be set back a minimum of 10m from the edge of the PROW to allow all vehicles, including those towing, to pull off the road while opening the gates, without obstructing the Public Right of Way. The parking provision and turning area for the site are acceptable, allowing vehicles to exit in forward gear. These matters could be all be dealt with by way of condition if members were minded to approve.
88. Officers are aware that a small section of the access road on Moreton Lane is subject to flood risk from rivers (zone 3). This matter has been raised with Pembrokeshire County Council Highway Officers. They advised that alternative access is available that avoids this route. However, the alternative access is narrow and, if relied on for delivery of a static caravan or for whether emergency vehicles can use it, would require a swept path analysis. PCC felt this could be conditioned, if the application were being supported to be a prior to occupation condition but officers would want to revisit this in the event that members proposed approval, with the provision of further information. At this stage it is felt by officers that the matter is capable of being resolved and it is not therefore proposed as a reason for refusal.

89. Pembrokeshire County Council Highways Officers have not objected to the application, subject to planning conditions controlling the location of access gates, the bound surface for the access track, and appropriate parking and turning within the site. This would be in the form of a prior to occupation or pre-commencement condition. They also request that an informative note be added to any consent granted for contact to be made on the naming and numbering of all roads and new developments to facilitate the provision of service connections.
90. Officers consider that, with respect to access and parking, the current proposal could be supported subject to confirmation of the swept path for the alternative access and the above conditions and would accord with Policies 59 and 60 of LDP2 if it were not otherwise unacceptable.

3.6 Surface Water Drainage and Foul Drainage

91. Policy 29 (Sustainable Design) of LDP2 requires that all development proposals be well designed for water and drainage. Policy 32 (Surface Water Drainage) of LDP2 requires that development incorporate sustainable drainage systems to dispose of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.
92. Saundersfoot Community Council expressed concerns about the sewage system capacity for this development.
93. Dwr Cymru Welsh Water (DCWW) confirm that the proposed site is located within the catchment of a public sewerage system which drains to Tenby Waste Water Treatment Works (WwTW). They have considered the impact of the foul flows generated by the proposed development and conclude that these flows can be accommodated within the immediate public sewerage system, whereas the WwTW has a phosphorus consent limit in place and is compliant with its final effluent permits. However, the WwTW is currently failing to comply with the 95% quartile for its flow passed forward (FPF) performance at the time of this consultation.
94. Notwithstanding this, in line with the environmental regulator's National Environment Programme, DCWW are required to deliver a scheme at the WwTW to ensure 95% quartile compliance with our FPF performance and therefore would insist that a planning condition be imposed on any consent granted to ensure that no buildings on the application site shall be brought into beneficial use earlier than 31st December 2026 unless the scheme at the Waste Water Treatment Works, into which the development shall drain, has been completed and written confirmation of this has been issued by the Local Planning Authority. This is required to prevent overloading of the WwTW and environmental pollution.
95. In addition, they request that an informative note be added to any consent granted to deal with a connection to the public sewer.
96. DCWW recognises that the application details state that the surface water will be disposed of via a soakaway within the site area. This disposal method is considered suitable for surface water discharge and will be subject to Schedule 3 of the Flood and Water Management Act 2010. The development, therefore, requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'.

97. DCWW does not object in principle to the proposed method of surface water disposal and refers to separate consultation and agreement with PCC Drainage Engineers, but requests that a condition be imposed to ensure that no surface water or land drainage shall be permitted to connect directly or indirectly with the public sewerage network.
98. The Drainage Engineers at Pembrokeshire County Council have indicated that the application details surface water disposal via soakaways; this is deemed a suitable method, subject to satisfactory ground conditions and percolation results.
99. They also note that no SAB application has been received to date, and SAB consent will be required, as the construction area with drainage implications appears to be in excess of 100 square metres. As SAB consent is not in place, a condition requiring details of surface water disposal to be agreed in writing by the Local Planning Authority prior to occupation of the site could ensure appropriate compliance with the LDP policy. An informative note would need to be added to any consent granted to advise the applicant of the need for SAB consent prior to the commencement of any works on site. An informative note would also need to be added to advise that due to the close proximity of an ordinary watercourse with the application site, no structures are to be built over or within 3 metres of the edge of the watercourse.
100. Subject to an appropriate condition, the development is therefore considered to be acceptable in terms of Policies 29 and 32 of LDP2, TAN 15 and Schedule 3 of the Flood and Water Management Act 2010. This does not outweigh the other concerns with this application proposal.

3.7 Impact on Scheduled Ancient Monuments

101. Cadw have been consulted as a statutory consultee due to the presence of a Scheduled Ancient Monument (SAM) within 500 metres of the development site. Cadw's lack of response usually indicates they have no comment. The nearest SAM is The Tramroad Incline to the north/north-east of the site, which is separated from the proposal by existing residential development. In this context, Officers at Cadw have advised that they consider that the proposal is unlikely to cause harm to the Scheduled Ancient Monument's setting. This does not outweigh the other concerns with this application proposal.

3.8 Other Matters

102. The Coal Mining Remediation Authority consultation currently remains outstanding. However, their previous consultation responses had previously indicated that they reviewed the application proposal and confirmed that the site falls within the defined Development Low Risk Area, and that a standing advice note should be added to any consent granted to advise the applicant of these risks. This does not outweigh the other concerns with this application proposal.
103. The agent has submitted a range of previous appeals which cover Gypsy and Traveller accommodation provisions. Officers have assessed these appeals and do not consider them to reflect the same level of landscape sensitivity as an application located within a National Park; therefore, they do not feature as significant material considerations.

104. As set out in the policy section above, the Authority must consider its duties under both the Equality Act and the Human Rights Act 1998 when making its decision. Specifically, the Authority must consider that the applicant's status as a Gypsy Traveller is a protected characteristic, and Officers have therefore considered relevant guidance in the form of the Circular from the Welsh Government and the relevant policy of the Local Development Plan 2.
105. In relation to the Human Rights Act 1998, Officers have considered Article 8 (Right to respect for private and family life, home and correspondence), Article 14 (Prohibition of discrimination) and Article 1 of Protocol 1 (Right to peaceful enjoyment of possessions and protection of property). As set out above, the Authority recognises that the applicant currently benefits from a home and that refusal of this application would not result in the applicant becoming homeless.
106. Officers, in reaching a recommendation, have weighed the individual's rights against the wider public interest to determine whether development should proceed. In this case, the potential harm to landscape and the special qualities of the National Park is considered to outweigh other considerations, resulting in a recommendation to refuse.

4. Conclusion

107. The proposed development has resulted in unacceptable landscape impact on the National Park and has likely disturbed species and habitats within the countryside in contravention of the stepwise approach of Planning Policy Wales which seeks to avoid harm to habitats. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape.
108. Whilst there is the potential to achieve a net benefit to biodiversity through a detailed landscaping scheme, this would need to be combined with a secure mechanism in the form of a legal agreement to ensure long term management of all areas of land proposed for planting, which is not in place. So, whilst this could be achieved, the wider landscape impacts and lack of landscape capacity mean that this has not been sought by the Local Planning Authority.
109. The site is not considered suitable for development, contrary to the provisions of criteria d) and f) of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. As such, the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 10 (Sites and Species of European Importance), Policy 11 (Nationally Protected Sites and Species), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park), Policy 30 (Amenity) and Section 6 of Planning Policy Wales (Edition 12), the Conservation of Habitats and Species Regulations 2017 (as amended), and the Environment (Wales) Act 2016
110. The proposal would introduce caravan development in an area of the National Park which has already been assessed as being at maximum landscape capacity, resulting in unacceptable cumulative impacts that are contrary to Policy 41: Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance.

111. Whilst it is recognised that there is a need for Gypsy and Traveller pitches in Pembrokeshire, the GTAA 2019 did not identify any specific need within the National Park. The immediate, short-term need has been met, and the need for 2025 to 2033 is being addressed through allocations in PCC's LDP2 which is imminently due to move forward to LDP Hearings. It is also recognised that the applicant has no immediate need for accommodation. As such, moderate weight is given to the need, which does not outweigh the significant landscape and historic environmental harm identified in the proposal, which is given significant weight in this application. Impacts on residential amenity and on matters of access, drainage, and historic assets are acceptable or can be addressed appropriately through planning conditions; these matters do not outweigh the harm identified above. The proposal is therefore recommended for refusal.
112. In reaching a recommendation, due regard has been given to the requirements of sections 3 and 5 of the Well-being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. Recommendation

REFUSE, subject to the following reasons:

1. The proposed development has resulted in unacceptable landscape impact on the National Park and potentially disturbed species and habitats within the countryside. The proposal would not be compatible with the National Park's purpose of conserving and enhancing its natural beauty, wildlife, and cultural heritage, nor would it protect its Special Qualities or its landscape. As such, the proposal is considered contrary to Policy 1 (National Park Purposes and Duty), Policy 8 (Special Qualities), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park), Policy 30 (Amenity), (criteria d & f) of Policy 53 (Gypsy, Traveller and Showpeople Sites) of LDP2, Section 6 of Planning Policy Wales (Edition 12), and the Environment (Wales) Act 2016
2. The proposal would introduce caravan development in an area of the National Park without landscape capacity, resulting in unacceptable cumulative impacts that are contrary to Policy 41: Caravan, Camping and Chalet Development and the adopted Caravan, Camping and Chalet Supplementary Planning Guidance.