

Application Ref: NP/11/180

Application Type Full
Grid Ref: SN15320704
Applicant Mr CH Pendleton, Celtic Holiday Parks
Agent Mr G Blain
Proposal Change of use to 8 no lodges (on axel)
Site Location Meadow House Holiday Park, Summerhill, Narberth,
Pembrokeshire, SA67 8NS

Summary

This is a full application proposing the installation of eight holiday lodges on land at Meadow House Holiday Park, Amroth. The proposal has raised a number of fundamental objections that cannot be overcome by conditions and as such is recommended for refusal for being contrary to adopted development plan policy, detrimental to the special qualities of the National Park, and lacking in information concerning coal deposits and activity, protected species and neighbouring amenity.

Consultee Response

British Coal Corporation: No objection
Amroth Community Council: No objection
Environment Agency: No objection
PCC - Transportation & Environment: No Response Received - at the time of writing this report.
Dwr Cymru Welsh Water: No Response Received - at the time of writing this report

Public Response

The application has been advertised and neighbour notifications have been undertaken. Seven letters of objection have been received raising the following comments:-

- The extension to the holiday park is in a prominent position, and is at odds with what is otherwise an unspoilt stretch of cliff-top. The extension of the park is felt to be in direct conflict with the National Park Authority's duty to protect and conserve the special qualities and beauty of the National Park;
- The application is not a change of use as it has never been used for golf or tennis. The road permitted under the 1986 application was never implemented and has not been constructed on site. The dirt track on site is due to tractors depositing rubbish and rubble and accessing a fuel tank;
- The site is used as a dumping ground;
- The site has value for wildlife, including badgers;

- Sedum rooves are not achievable on the proposed chalets;
- No mention of how effluent is to be disposed of;
- The proposed replanting of removed trees will be inadequate for screening and reducing noise pollution from the club house;
- The submitted drawings do not show the position of neighbouring residential properties;
- The increase in number of units is not compensated for by any environmental benefits in terms of layout, design, and materials;
- The lodges “are caravans in disguise (on axles)”;
- Proximity of the lodges to neighbouring dwellings would result in a loss of their amenity;
- The elevated nature of the site will mean that the buildings will be seen even with hedging;
- There is no suitable public transport to the site, meaning that people have no choice but to use their cars.

Policies considered

LDP Policy 01 - National Park purposes and duty

LDP Policy 07 - Countryside

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 31 - Minimising Waste

LDP Policy 32 - Surface Water Drainage

LDP Policy 35 - Visitor Economy

LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW4 Chapter 04 - Planning for Sustainability

PPW4 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW4 Chapter 07 - Supporting the Economy

PPW4 Chapter 08 - Transport

PPW4 Chapter 11 - Tourism, Sport and Recreation

PPW4 Chapter 12 - Infrastructure and Services

PPW4 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG03 - Sustainable Design

SPG06 - Landscape Character Assessment Study, June 2009

TAN 05 - Nature Conservation and Planning

TAN 06 - Planning for Sustainable Rural Communities

TAN 11 - Noise

TAN 12 - Design

TAN 13 - Tourism
TAN 18 - Transport
TAN 22 - Planning for Sustainable Buildings

Officer's Appraisal

Background

This is a full application for the erection of eight detached holiday lodges at Meadow House Holiday Park, Summerhill. The Holiday Park is located to the south of Summerhill village, on the eastern side of the road between the village and Wiseman's Bridge. The existing holiday park is comprised of a mix of static units, tent pitches, with an associated club-house and shop. It occupies a sloping site in the open countryside with extensive views into and out of the site.

The application site is adjacent to the highway and is currently used as a rubbish dump for the holiday park, including piles of discarded furniture, fittings, concrete, slabs, wood, etc. The access to the site is to the north, off the main access to the Park. It leads into an area of hardstanding that is currently used for parking and gravel storage. A trackway leads from this round to the rear of the club-house, with another branching off it and curving around the eastern side of the site. To the west of this lies a depressed area in which much of the rubbish lies. A row of mature conifers runs along the eastern boundary of the site, with more trees along the southern boundary, beyond which lies a detached house. Beyond the road lie more detached houses, at a lower level than the site.

Current Proposal

The application proposes the erection of eight detached holiday lodges and associated parking area. The lodges would be erected in two approximate rows of four, orientated in a north-south direction. A network of pathways would lead from the lodges to the car parks associated with the site, which are located to the rear of the reception complex and on the existing gravel / storage area. A total of 12 spaces would be provided for the eight lodges. Although described on the drawings as timber, the lodges would in fact be constructed of timber effect cladding under pitched sedum rooves. Windows and doors would be light oak coloured upvc. They would measure approximately 14.4m x 6.9m x 3.8m in size with areas of raised decking to the front and side of each one. Additional hedgerow planting would be undertaken to the southern boundary of the site, whilst the existing hedgerow along the roadside would be allowed to grow to a minimum of 2.8m in height.

The application has been supported with the following information:-

- A Design and Access Statement;
- A Business Plan;
- An Arboricultural Report;
- Literature concerning a sewage treatment works;

- A Transport Statement.

Key Issues

This application raises the following planning matters:-

- Impact of the proposal on the special qualities of the National Park;
- Planning policy requirements for new tourist accommodation;
- Planning history;
- Highways, parking and servicing matters;
- Coal issues;
- Drainage and the water environment matters;
- Landscaping and tree matters;
- Protected species and wildlife matters;
- Amenity matters.

This application is being reported to the Development Management Committee at the request of a Member of the Authority due to the extent of the public interest involved in the application.

Policy 38 of the Pembrokeshire Coast National Park Local Development Plan makes it clear that “New camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted. Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape.” The current application seeks to locate eight lodges on land that is currently used as a rubbish dump for the site. The applicant is aware of the requirements of Policy 38 of the Development Plan and that it is a Departure from it, but considers that the additional lodges would allow the park to be upgraded in quality, which would be to the economic benefit of the National Park. They also consider that there has been a material start on the permitted golf course on site (the implementation of the road going through the site), and that the lodges will improve the visual appearance of the land which has become “an eyesore”. The site is in a visually prominent location within the landscape, and as a result the application proposes additional landscaping to screen the new lodges.

Policy 38 makes it clear that in exceptional circumstances site areas may be enlarged where an overall environmental improvement is achieved. Although the implementation of the lodges would necessitate the removal of the holiday park’s rubbish on the site, the application has not clearly demonstrated any overall environmental improvement to either this site or over the holiday park as a whole. The applicant states that the permitted golf course could be implemented on site: even if this is the case, it would have less of a visual impact on the special qualities of the National Park than the proposed eight lodges and their ancillary infrastructure. Additional planting is proposed, along with retention of some existing hedgerows, but the site is visible within

the wider landscape due to it being on a hill-side location. The location of a further eight lodges would add to the holiday park's visual intrusion within the landscape, and it is not considered that the proposed landscaping is sufficient to ameliorate this loss of the special qualities of the National Park. In addition the application is contradictory on the materials to be used for the lodges (ie are they timber or timber-effect cladding?), and the use of sedum on pitched rooves could prove difficult to achieve and maintain. The design and materials of the lodges is therefore not considered to be sympathetic to the special qualities of the National Park, particularly if the lodges are to be metal cladding and the sedum rooves are unachievable. As such they would form intrusive and alien visual additions to this prominent location which would harm the character and appearance of the National Park.

The other two applications on other parts of the park involve alterations and extensions to the existing club-house (NP/10/451) and the stationing of 47 static caravans in lieu of the 55 touring caravans that already have permission (NP/10/450). The applicant considers that reducing the number of touring caravans will be compensated for by the erection of the eight new lodges, and that further investment into the National Park will result. Policy 1 of the Pembrokeshire Coast National Park Local Development Plan states that due regard will be made to foster the economic and social well-being of the local communities within it. Although the application has been supported with a Business Plan it does not provide clear information on how these eight new lodges will benefit the local economy. Notwithstanding this, the conservation of the natural beauty of the National Park is paramount. As a result the application is considered contrary to adopted Development Plan Policy and detrimental to the special qualities of the National Park, and is recommended for refusal.

The application was submitted with an Arboricultural Report that has been considered by the Authority's Trees and Landscape Officer. He raises no objection to the proposal subject to conditions requiring further details of any pre-development works to trees, scaled drawings of Construction Exclusion Zones, details of the storage and use of contaminants, and post development landscaping.

The site also lies over a Coal Referral Area and Coal Standing Advice Area, and this necessitates a consultation with The Coal Board. They consider that there are coal mining features and hazards which need to be considered in relation to the determination of this planning application, and that "It is unclear from the submitted plans as to whether the proposed development will involve intersection or disturbance of the ground." The application was submitted with two sectional drawings that show the chalets sat below existing ground levels, and as a result a Coal Mining Risk Assessment needs to be provided. As this has not been included with the application, this forms a further reason for refusal.

During the processing of the application neighbour objections were received raising several issues, including matters of loss of amenity and protected species and wildlife loss. TAN 5 - Nature Conservation and Planning makes it

clear that the presence of protected species is a material consideration in the consideration of any planning application and that it cannot be addressed through conditioning a survey post decision. The application was not supported by a Protected Species report due to the nature of the site, but in view of the observations of local residents that the site is valuable to wildlife, including badgers, this forms a further reason for refusal.

As regards the amenity issues that the neighbours have raised, the proposed lodges would occupy an elevated position in the landscape. The application relies on the existing and proposed landscaping to ameliorate overlooking and loss of privacy to neighbouring properties. The closest dwelling lies within approximately 20m of the nearest lodge, which would be elevated above it. Additional landscaping is proposed at this point, to provide screening for the lodges in the landscape. The submitted drawings show finished floor levels of the units, but concern is still raised as to the relationship of the proposed lodges with neighbouring residential properties, particularly in respect of their use and elevated position in the landscape, and the reliance of additional planting to ameliorate their impact. This forms a further reason for refusal.

At the time of writing the report, the highways comments of Pembrokeshire County Council had not been received, nor the comments of Welsh Water or the Environment Agency. Consequently if received they will be reported at the meeting.

Conclusion

The application raises a number of fundamental objections that cannot be overcome by conditions. The proposal is contrary to adopted Development Plan Policy in that it seeks to increase the number of lodges on site. It is also considered to add a visually incongruous and alien development in a prominent location that is to the detriment of the special qualities of the National Park and the amenity of the neighbouring properties. Insufficient information has been provided as regards coal measures and works, and protected species, which forms a further reason for refusal.

Recommendation

Refusal for the following reasons:

1. Policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan states that new camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or the enlargement of the approved site area will not be permitted. Exceptionally static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape. The provision of eight new lodges enlarges an existing holiday park and has not been justified with over-riding environmental improvements either to the site and its setting in the

surrounding landscape. The proposal is therefore contrary to adopted Development Plan Policy.

- 2.
3. Policy 1 of the Pembrokeshire Coast National Park Local Development Plan requires the conservation of the natural beauty, wildlife and cultural heritage of the Park. Policy 8 requires the special qualities of the Park to be protected and enhanced. Policy 15 does not permit development that would adversely affect the qualities and special character of the Park. Policy 29 requires an integrated approach to design and construction. Policy 30 requires that development will not be permitted where it has an unacceptable impact on amenity. The proposal by reason of the siting, location, and elevated position of the lodges, and their design, including the use of non-traditional materials, is considered to be a visually intrusive and prominent development that is at odds with special qualities of the National Park. The proposal is therefore considered to be harmful to the National Park and contrary to adopted Development Plan Policy.
- 4.
5. Policy 11 of the Pembrokeshire Coast National Park Local Development Plan states that development that would harm protected species or their habitats will only be permitted where the effects can be acceptably minimised or mitigated. Policy 30 requires states that development will not be permitted where is has an unacceptable impact on amenity. The General Permitted Development Order requires consultation with the Coal Authority in Coal-field Referral Areas to assess public risk. The application has not been submitted with sufficient information to allow a comprehensive assessment of the proposal's impact on neighbouring amenity, on protected species and their habitats, and on coal mining works and reserves. As a result the impact of the scheme on neighbouring properties, protected species and their habitats and an assessment of the proposal in terms of coal-field risks cannot be assessed.

Additional Material

Decision Drawings

- 654.3A/09/000VC (received 28th April 2011);
- 654.3A/09/00-VC (received 28th April 2011);
- 654.3A/09/07 (received 28th April 2011);
- 654.3A/09/05 (not date stamped);
- 654.3/08/1/1000 (received 28th April 2011);
- 654.3/08/1/100 (received 28th April 2011).



83.2m

Meadow House Apartments

Hedgerow screening 4m away from boundary

Existing hedgerow to be kept to a minimum height of 2.8M with evergreen hedge planting every 2M to provide all year round screening

Lodges to have seedum roofs, to blend naturally into the landscape

LANDSCAPING KEY

- Existing (or site boundary) Trees:- *Fagus sylvatica*, *Quercus Robur*, *Fraxinus Ornus*, *Sorbus Aucuparia*.
- Tree Planting:- *Fagus sylvatica*, *Quercus Robur*, *Fraxinus Ornus*, *Sorbus Aucuparia*.
- Low Shrub Planting:- *Cornus Alba*, *Cornus Stolonifera Flayramae*, *Viburnum Rhytidophyllum*, *Spirea Arguta* and *Skimmia Japonica*.
- Grassed Areas

Swn - y - mor

NP 11 1 80

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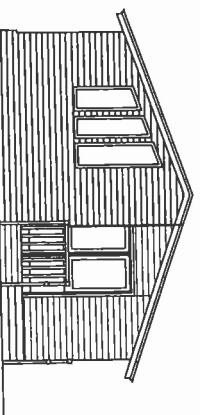
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@ MEADOW HOUSE HOLIDAY PARK, AMROTH,
PEMBROKESHIRE

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LANDSCAPING DETAILS

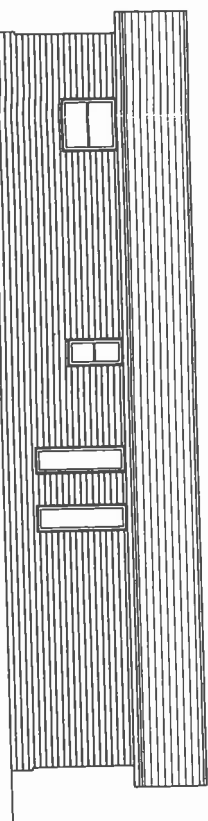
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DRAWN BY:	N. KIRKHOUSE	CHECKED BY:	
CLIENT:	MR. H. PENDLETON	SCALE:	1/500
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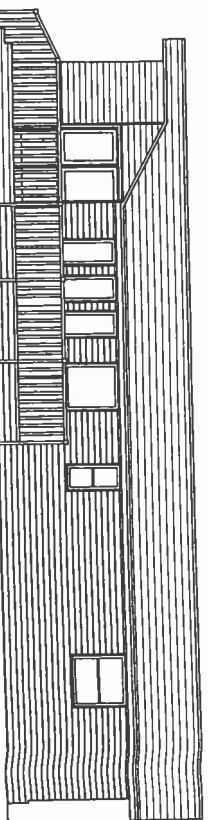
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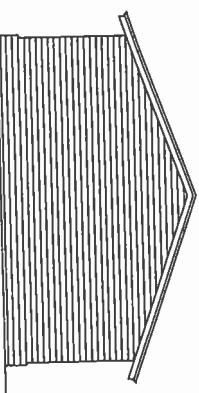
Rear Elevation



Front Elevation



R/H Elevation



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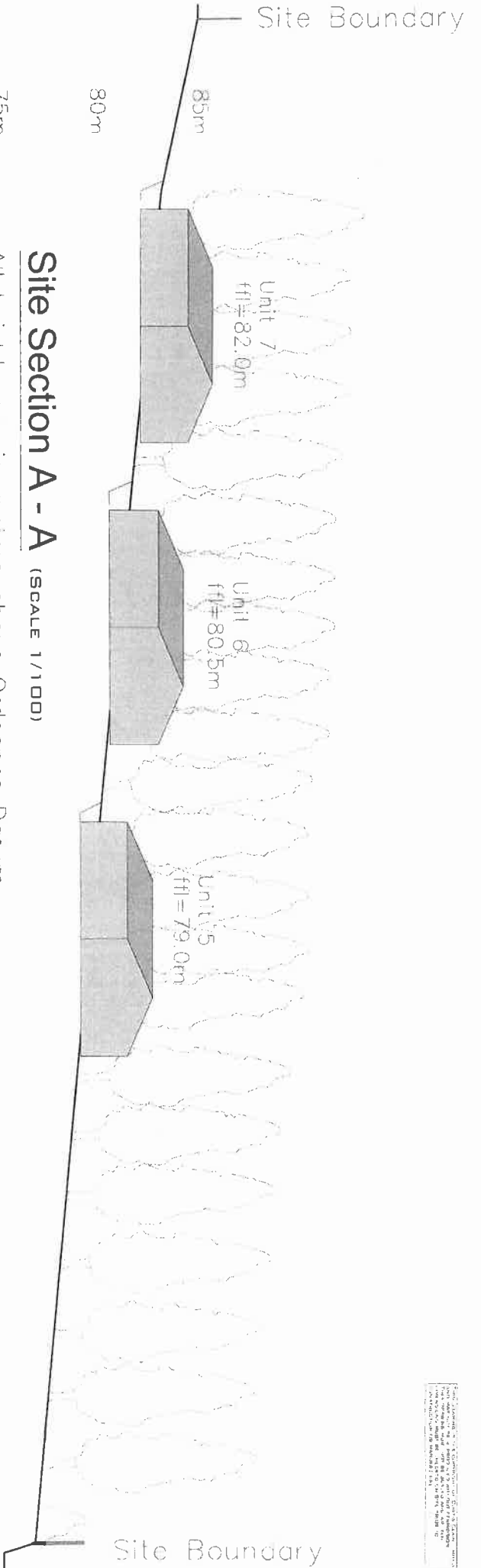
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CLIENT:

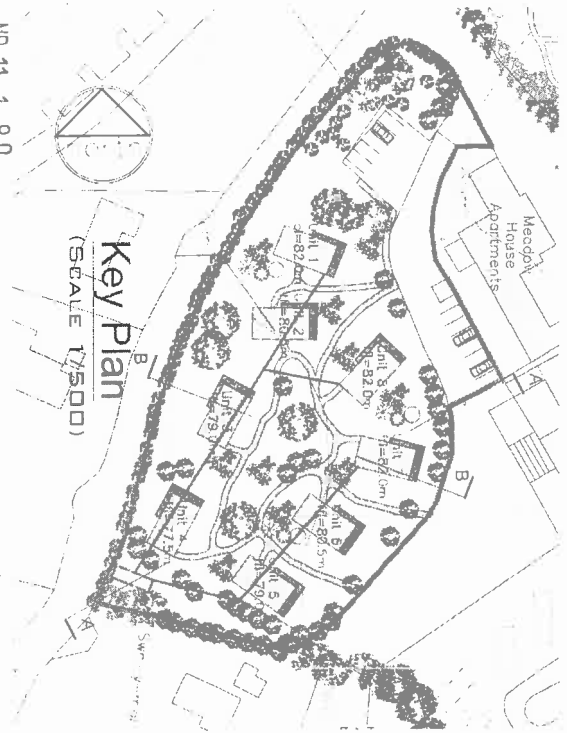
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A3



Site Section A - A (SCALE 1/100)

All heights are in metres above Ordnance Datum

- existing ground level
- - - proposed ground level

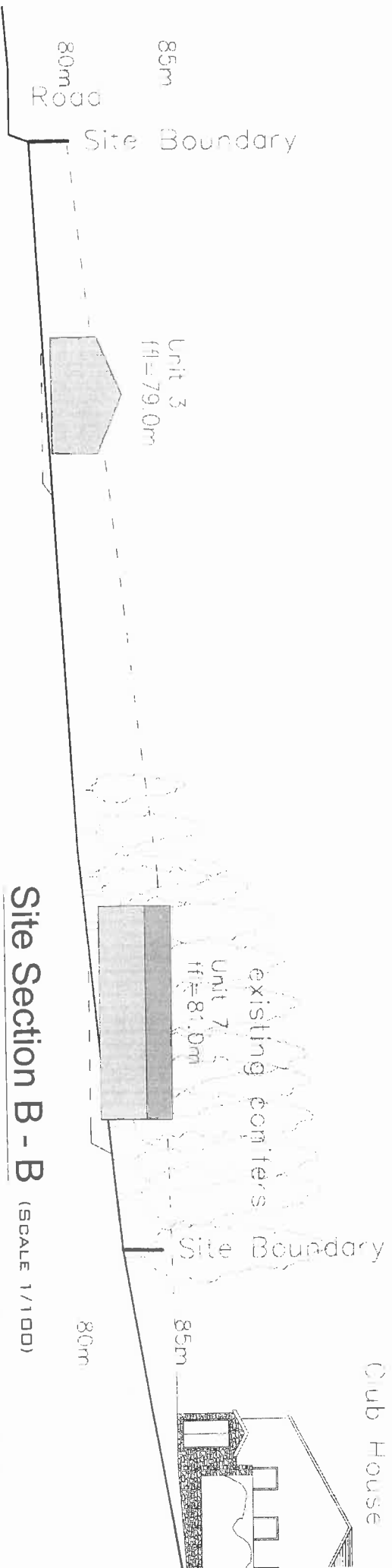


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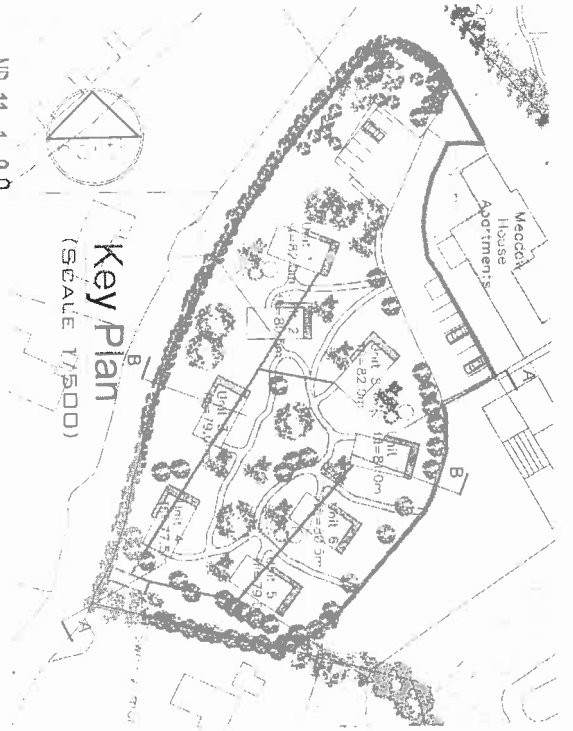
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		CLIENT:	MR. H. PENNILETON	SCALE:	AS SHOWN A1

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Site Section B - B (SCALE 1/100)

All heights are in metres above Ordnance Datum
 ——— existing ground level
 - - - - - proposed ground level

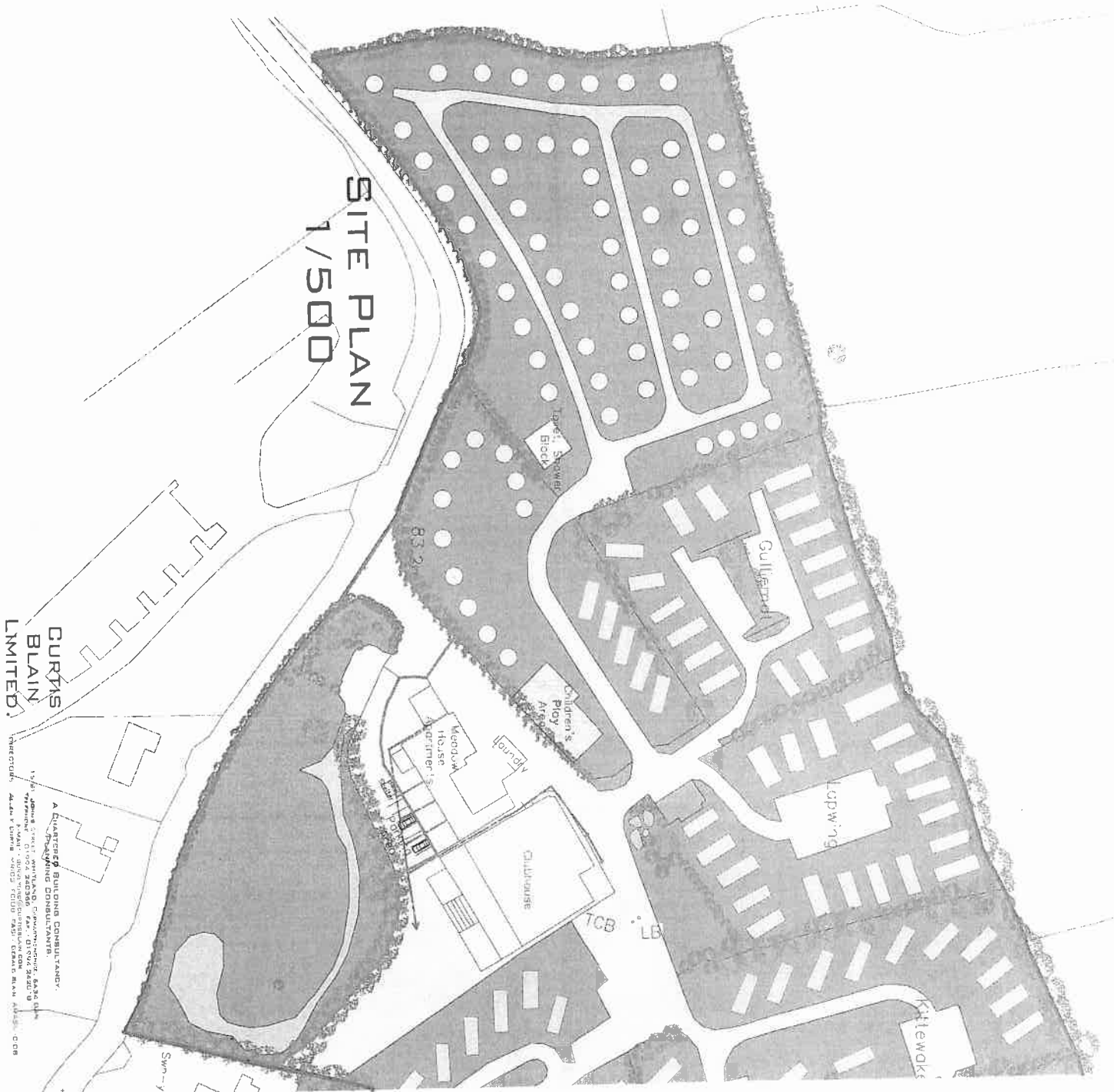


Key Plan
(SCALE 1/500)

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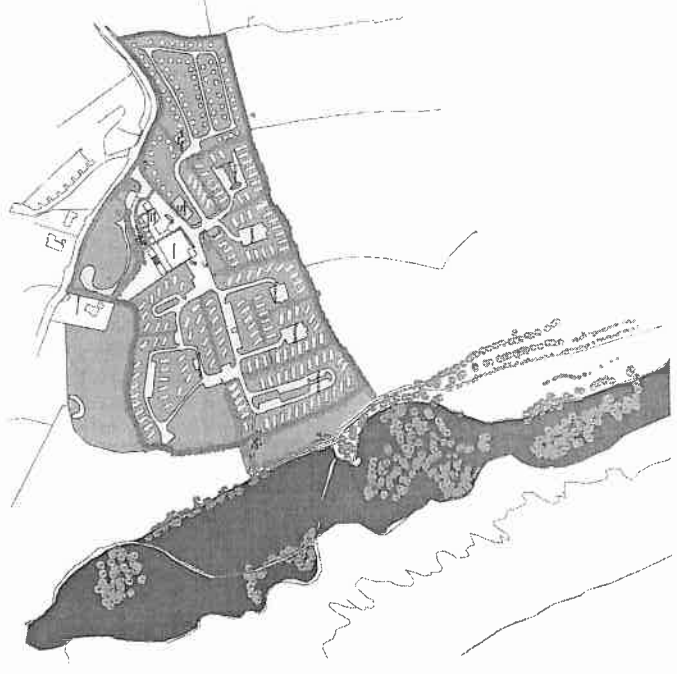
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DWG TITLE	DRAWN BY	CHECKED BY
SITE SECTION B-B (EAST-WEST)	MS	
	DESIGNED BY	SCALE
	Mr H PENNIE	A5 SHOWN A1



**SITE PLAN
1/500**

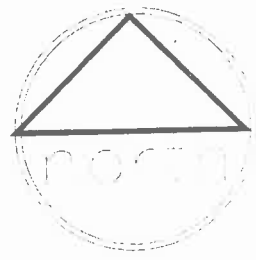
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LOCATION PLAN 1/2500

NP 11 1 80



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REPRESENTATIVE OF THE DEVELOPER TO INCLUDE
ACCESS TO AND FROM SITE FROM MEETING WITH MISS
HIRST 20.04.11 - 26.04.11. I DO MAKE LAYOUT FROM
MEETING AND EMAIL FROM PLANNING OFFICER
25.01.11, 28.01.11 (BOUNDARY LINES) FROM
MEETING WITH PLANNING OFFICER 08.11.10.
17.11.10 (DPA)
REPLACING TELEPHONE CONVERSATION WITH
PLANNING OFFICER ON 02.11.10, 03.11.10.
DRAWING NO: 54.3A/09/1000-VC
DATE: 04/10

DATE	CHANGE OF USE TO B AND LOGGED ON AND A HOLIDAY HOME, HOLIDAY PARK, AMROTH, PEMBROKESHIRE
DATE	04/10
DRAWN BY	CHECKED BY
N. KIRKHOUSE	
CLIENT	SCALE
MR. H. PENLETON	AS SHOWN A1
DWG TITLE	
SITE AND LOCATION PLAN	
AS EXISTING	

SITE PLAN 1/500

LANDSCAPING KEY

Existing landscape to be left in a minimum height of 3m to provide all your needed screening

Loggia to three-section
100% to be used
for the landscaping

Existing: On-site boundary lines, Fencing, Gates, Driveways, Paved Areas, etc.

Proposed: Fencing, Gates, Driveways, Paved Areas, etc.

Low Stone Planting: Conifers, Shrubs, etc.

Medium Stone Planting: Shrubs, etc.

High Stone Planting: Shrubs, etc.

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ALEX A MADON REVISION 04/10
ANB
ANB

DRAWING NO.: 654_3A/09_00 VC
DATE: 04.10
DRAWN BY: N. KIRKHOUST
CHECKED BY: [Signature]
SCALE: AS SHOWN A1

LOCATION PLAN 1/2500

NP 11 1 80

R.V.D. DRAWING AMENDED / DESCRIPTION OF PROPOSALS AND SITE INDENTIFIED FROM THE TITLE WITH THIS SHEET 20.04.11 26.04.11 BP
REV. DRAWING AMENDED / DRAWING / COMMENT FROM 25.01.11 28.01.11 BP / REVISION / COMMENT FROM 17.11.10 BP
REV. DRAWING AMENDED / REVISION / COMMENT FROM 17.11.10 BP
REV. DRAWING AMENDED / REVISION / COMMENT FROM 17.11.10 BP

