# Application Ref: 10/141

Application Type Full

**Grid Ref:** SM74392412

Applicant Dr Thelma Hardman

Agent Mr R Coy, Roger Coy Partnership

Proposal Alterations to existing Agricultural Building to provide

permanant Toilet and Shower facillities to compliment

existing Camping and Caravan site

Site Location Porthclais Farm, St Davids

#### Summary

Full planning permission is sought for the alteration of an existing agricultural building to provide replacement w/c and shower facilities on this camp site at Porthclais Farm, near St.Davids. The proposal has been amended since submission to reduce the amount of facilities being provided and to also include the removal of the existing amenity block on the site. The application, as amended, is considered to meet planning policy whilst also offering planning gain through the removal of the existing amenity block, the improvement of another agricultural shed and the provision of some additional landscaping. The proposal is therefore recommended for approval subject to a number of planning conditions to safeguard the character and amenity of the area.

The application has been brought before the Development Management Committee because of the controversial nature of the proposal having regard to the representations received and the views of St.Davids City Council.

#### Consultee Response

**St Davids City Council**: Supporting - Support the application on condition that the size of the new toilet block should meet the precise requirement of the site licence from Pembrokeshire County Council and that the conditions for the removal of both the old and temporary facilities are clearly defined to follow completion of the new toilet block.

**Head of Public Health & Environment**: No objection - The new toilet block covers the facilities required by the Site Licence.

Environment Agency Wales: No Response Received

The National Trust: No Response Received

#### **Public Response**

A comprehensive representation of objection with an accompanying legal view has been received from a near neighbour. A full copy of this representation is held on the planning file, however, this party's concerns may be summarised as follows:

The proposed facilities are significantly greater than required by the PCC license (between 50 and 150%) and would allow a more intensive use of the site. They would also relate to a temporary use of the land as a campsite including the additional tents generated by the 28 day rule. There is no policy support for a proposal of this nature and to allow the application would open the way for a judicial review. Concern is also raised about the precedent of granting planning permission here, the possibility that the amount of facilities within the amenity block could be increased in the future and the quality of the landscaping is also queried.

# Policies considered

LDP Policy 01 - National Park purposes and duty

LDP Policy 08 - Special Qualities

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 40 - Site Facilities on Tent, Chalet and Caravan Sites

PPW4 Chapter 04 - Planning for Sustainability

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

PPW4 Chapter 06 - Conserving the Historic Environment

PPW4 Chapter 11 - Tourism, Sport and Recreation

PPW4 Chapter 12 - Infrastructure and Services

SPG03 - Sustainable Design

TAN 12 - Design

TAN 13 - Tourism

# Officer's Appraisal

### **Background & Description**

Porthclais Farm is located on the St.Davids peninsula about 1km south west of the city of St.Davids. In addition to being a working farm there is also an established caravan/tent site here which uses the surrounding fields close to the main complex of farm buildings. One of the existing outbuildings has an amenity block built off the rear elevation which serves the holiday makers staying at the site whilst a larger, modern, agricultural shed is located at the southern end of the main farm complex.

The planning history goes back several decades but may be summarised today as comprising permission for 24 static caravans on land behind the main farm complex and the use of 5 adjacent fields for 12 tourers and 30 tents (between Easter and the end of October each year). The farm also benefits from the '28 day' rule for an unlimited number of tent pitches at this location.

In 2009 and 2010 retrospective applications were made for the siting of unauthorised portacabins on the site over the summer season. The first of these was refused and enforcement action sanctioned. The later application was submitted shortly after the current application before you but was withdrawn in September 2010 when the portacabins were removed from the site.

### **Current proposal**

The proposal involves the remodelling of the western end of the existing portal framed agricultural shed at the southern end of the main farm complex to create a new amenity block. The agricultural shed presently has a reverse facing mono-pitched roof facing outwards towards the surrounding camping fields. It is proposed to demolish this section of the shed and replace it with a duo-pitched building measuring 181/2m long by 43/4m wide and 4m high to ridge. It would occupy the same footprint of the section of shed to be demolished and would retain the same eaves level as the main shed off which it would effectively be built. The front of the new amenity block would have a projecting canopy over the entrance doors and the external finishes would comprise light grey profile metal sheeting to the roof, Yorkshire boarding over painted concrete blockwork to the walls and matching timber doors. There would be no windows as such, however, natural light would be provided by a series of roof lights in the rear plane of the main roof. The amenity block would offer separate male and female toilet facilities together with wash basins and showers. The central area of the building would also include a unisex disabled shower and w/c, a changing unit (for babies), communal deep sinks and a cleaner's store cupboard. Foul drainage would be directed to the existing septic tank which serves the site. The area in front of the new amenity block would be resurfaced in a bound granular material and its perimeter would be defined by a landscaping bund.

Further to discussions with officers the application has been amended to specifically include the removal of the existing amenity block and the reduction in the amount of facilities that would be provided within the new amenity block.

The application has also been accompanied by a design and access statement.

### Key Issues

The key issues are considered to be whether the proposal complies with the relevant policies of the LDP relating to the provision of site facilities on caravan / camp sites in the first instance and the impact of the proposal upon the character and amenity of the area more generally.

This is undoubtedly a prominent and sensitive location within the National Park. It is also an established camping and caravan site which appears to have become more popular in recent times. This situation is somewhat compounded by an influx of campers over the summer period in connection

with the '28 day' rule which allows additional tents on sites without the need for planning permission.

Policy 40 deals with site facilities on caravan and camping sites and states that the development of retail and other facilities on these sites will be permitted where a) it can be demonstrated that the facility is not already available in the vicinity; and the scale and design of the facility is in keeping with the character of the surrounding area; and b) the vitality and viability of retailing and services of nearby Centres are not adversely affected.

The proposal does not involve any retail activity but rather the provision of other facilities (i.e. toilets and showers). The supporting text to this policy accepts that caravan and camp sites generally require good quality washing and toilet facilities and goes on to say that on small sites the development of facilities in excess of those required by the licensing authority will be resisted. This is to ensure the scale of facilities remains appropriate for their purpose. The supporting text also recognises that a balance needs to be struck between the need to maintain or improve the quality of site facilities (having regard to licensing requirements) and the need to safeguard the facilities of nearby Centres.

The main thrust of the objector's concern is that the proposal involves the provision of facilities in excess of what is required by the site license and that to allow the development would therefore be contrary to policy and would encourage greater use of the site whilst also setting a precedent for other sites. Concern is also raised about the possibility of the applicant increasing the amount of facilities within the new amenity block at a future date and the quality of the proposed landscaping is also challenged. The St.Davids City Council offers its support so long as the size of the new amenity block meets the precise requirements of the site license and that conditions are put in place to ensure the removal of the old amenity block and any temporary facilities following completion of the new block.

A site license prescribes the minimum amount of facilities needed for a given site. At Porthclais the license allows for a total of 15 items (comprising 2 male wc's, 2 urinals and 3 wash basins, plus 3 female wc's, 3 wash basins and 2 generic showers). The existing amenity block has a total of 17 items (comprising 4 male wc's, 2 urinals, 2 wash basins and 1 shower, plus 4 female wc's, 2 wash basins and 2 showers). The proposed amenity block would have a total of 21 items (comprising 3 male wc's, 3 urinals, 3 wash basins and 2 showers, plus 4 female wc's, 4 wash basins and 2 showers). It would also have dedicated disabled and family changing facilities. The net change in the number of facilities would involve an increase from 15 (licensed) or 17 (actual) to 21 (proposed) plus the aforementioned disabled / family units. The licensing section of Pembrokeshire County Council has been consulted and they confirm that the new amenity block would cover the facilities required and that there is no objection to the application.

Turning to whether this change in the amount of facilities is consistent with policy 40 it should be noted that the reference to licensing requirements is not

contained within the main text of the policy itself. It is instead contained within the supporting text which accompanies the policy. The wording is also important; it says that the development of facilities in excess of those required by the licensing authority will be 'resisted'. What it does not say is that such facilities will not be permitted. So whilst the inference is there, it is not an absolute, even when the policy is read as a whole. Accordingly it may be possible to increase the amount of facilities under this policy beyond the licensing criteria referred within the supporting text subject to making a careful assessment of the proposal on its individual merits.

The site has permission for a total of 42 pitches (12 touring caravan and 30 tents) and they each have the potential to cater for customers ranging from individuals to large families. Then there is the unlimited number of additional tents that could use the site under the 28 day rule. Having regard to this scenario and the policy framework set out above, the increase in the amount of toilet and washing facilities associated with the new amenity block is not considered to be unreasonable or excessive in this instance. The new amenity block would also offer a reasonable upgrading of the facilities to modern standards whereas the current facilities are very basic and are not disabled friendly.

The scale and design of the facility would be in keeping with the character of the area and would also offer significant planning gain through the removal of the original amenity block (which is unsightly and incongruous) and the improvement of the modern agricultural shed which faces the camping area. This enhancement is welcomed and is supported by other LDP policies which deal with design, amenity and conservation of the Park's special qualities in this prominent rural location.

The proposed landscaping is intended to soften the area about the new amenity block and is welcomed in principle, but its detailing and planting would need to be carefully controlled to ensure the quality is right. A traditional Pembrokeshire hedge bank is considered to be appropriate for this rural location and this could be covered by the use of a planning condition. Further conditions would be necessary to ensure the original amenity block is demolished in a timely manner upon completion of the new one, that the approved amenity facilities are only used by patrons of the caravan / camping site, the amount of facilities contained within the new amenity block are not added to at a later date and samples / colours of external finishes are agreed before the commencement of works.

In response to the concern about the development encouraging greater use of the site there are sufficient planning controls in place to prevent this and if necessary enforcement powers to deal with any unauthorised development or intensification of the site. With regard to precedent it is an established planning principle that each proposal should be considered on its merits. With this being the case it does not necessarily follow that similar proposals would be acceptable on other sites.

In summary, notwithstanding the views of the objector and the City Council the proposal is considered to be acceptable having regard to the provisions of the development plan, related guidance and the comments of other consultees, including the licensing section of Pembrokeshire County Council.

#### Conclusion

The application, as amended, is considered to be policy compliant whilst also offering planning gain through the removal of the existing amenity block, the improvement of another agricultural shed and the provision of some additional landscaping. The proposal is therefore recommended for approval subject to a number of planning conditions to safeguard the character and amenity of the area.

### Recommendation

That the application be approved subject to the following conditions:

- 1. Development to commence within 5 years
- 2. Development in accordance with amended plans
- 3. Finishes and samples of external finishes to be further agreed
- 4. Removal of existing amenity block within 6 months of completion of approved amenity block
- 5. The facilities associated with the new amenity block shall only be used by patrons of the camp site.
- 6. The facilities within the new amenity block shall not be increased or added to in any way
- 7. Landscaping in accordance with Pembrokeshire hedge bank detail

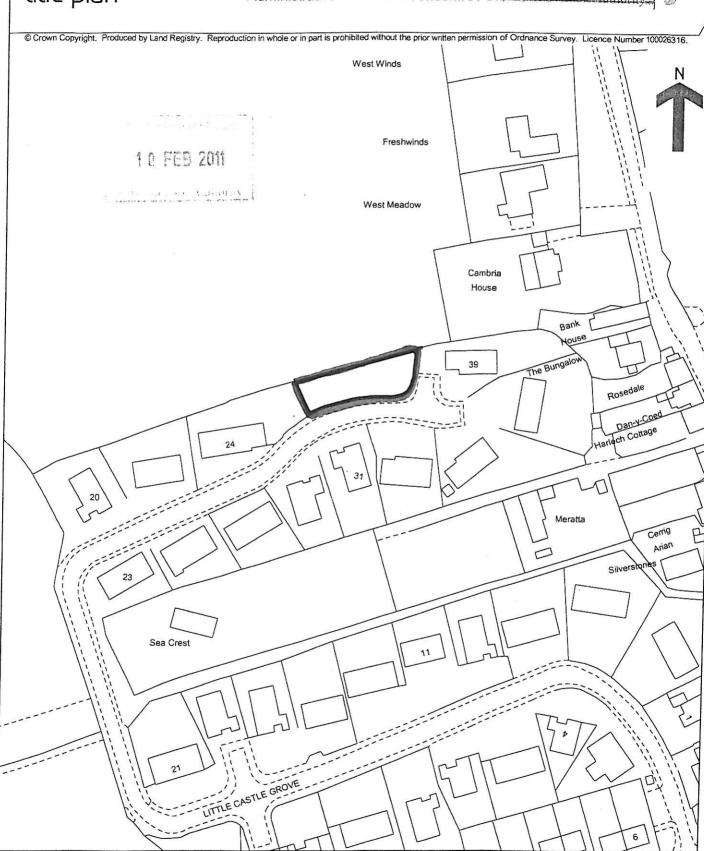
# Land Registry Official copy of title plan

Title number CYM497634

Ordnance Survey map reference SM8607NE - 7 DEC 2010

Scale 1:1250 enlarged from 1:2500

Administrative area Pembrokeshire / Sir Benfro Dark



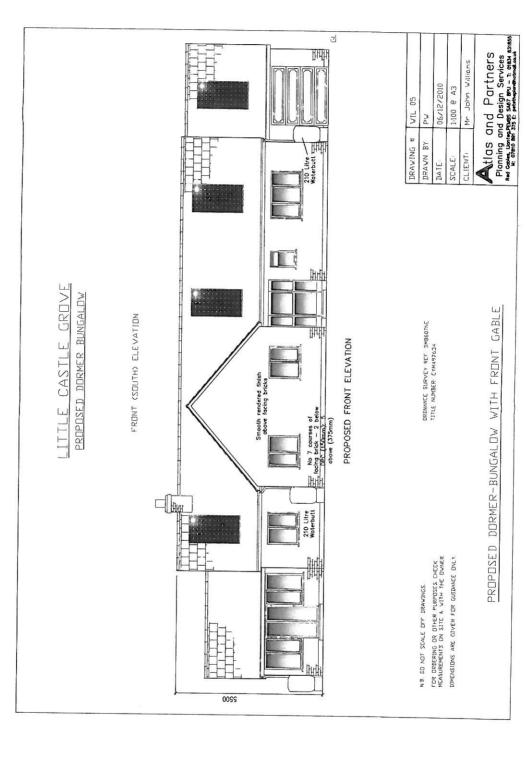
This official copy issued on 25 June 2010 shows the state of this title plan on 25 June 2010 at 14:48:24. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).

This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.

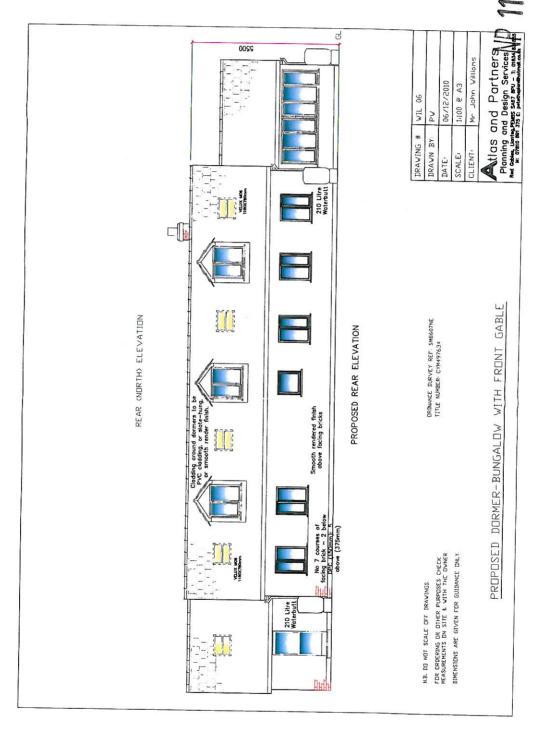
This title is dealt with by Land Registry, Wales Office.



Contract of the second 1 0 FEB 2011



NP 11 O



The Casterior L. I. : 0 FEB 2011 The second control of the second control of

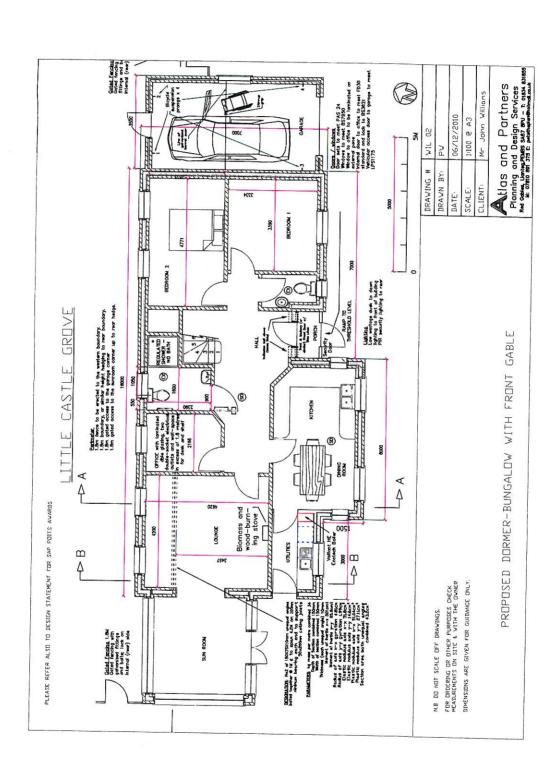
1:100 & A3 Mr Jahn Williams 06/12/2010 PV DRAWN BY: DATE: SCALE: CLIENT:

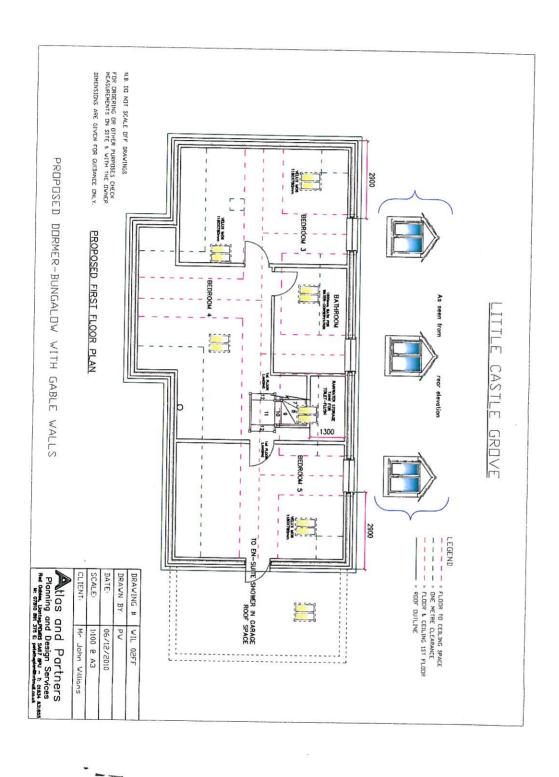
Atlas and Partners
Planning and Design Services
Red cleare, Includence States
in 17810 1881 573 E. perchapter States

DRAWING # WIL 04 2200 210 Libra 덩 PROPOSED EAST ELEVATION PROPOSED DORMER-BUNGALOW WITH FRONT GABLE PROPOSED WEST ELEVATION DRDNANCE SURVEY REF. SHB607NE TITLE NUMBER. CYM497634 Shouth randered feam above feeing bridge Deblemend of aut from emosts rendered above lixing brids. ZIO Libra FOR ORDERING OR DTHER PURPOSES CHECK MEASUREMENTS ON SITE 8. VITH THE OWNER. DIMENSIONS ARE GIVEN FOR GUIDANCE ONLY N.B. DD NDT SCALE OFF DRAWINGS.

To Cantage 1

A CONTRACTOR





100 FEB 2011