Application Ref: NP/11/180

Application Type

Full

Grid Ref:

SN15320704

Applicant

Mr CH Pendleton, Celtic Holiday Parks

Agent

Mr G Blain

Proposal

Stationing of 8 No.Lodges (on axel)

Site Location

Meadow House Holiday Park, Summerhill, Narberth,

Pembrokeshire, SA67 8NS

As members are aware this application was deferred at the last meeting to carry out a site visit which was held on 27th June 2011.

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

PCC - Transportation & Environment: Objecting - Does not make adequate provision for parking of vehicles clear of the public highway. No details of suitable works that will mitigate the effects of traffic associated with the proposal.

The National Trust (S): Objecting

Amroth Community Council: No objection Dwr Cymru Welsh Water: No objection British Coal Corporation: No objection

Environment Agency: Conditional Consent - Standard Advice Guidance

Notes- (See attached response)

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.
- Does not conform with the development plan
- Noise/Light Pollution
- Infrastructure (in particular highways and sewage) cannot cope with further development.

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

Item 6 - Report on Planning Applications

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.

The Highways officer has also objected to the application on the grounds that the proposed development does not make adequate provision for the parking of vehicles clear of the highway and there are no details of suitable works that will mitigate for the effects of the traffic associated with the proposal. Whilst these objections may be able to be overcome through the submission of further information, this is not currently available and the highway concerns therefore form a further reason for refusal.

A number of comments have also been received with regard to the sewage system and the impact of such a system on the amenities of the area. The Environment Agency has recommended conditional consent requiring a scheme for disposal of foul water to be agreed prior to commencement of the development. The response is attached to the report and clearly identifies the requirements for such a scheme to ensure it meets the regulations in respect of the discharge of foul water. In light of this advice there is no objection to

this application on the grounds of the sewage infrastructure which would be controlled through other regulatory bodies.

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, protected species and highway matters, which form further reasons 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. 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.
- 3. 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.

4. Policy 53 of the Pembrokeshire Coast National Park Local Plan requires development to only be permitted where appropriate access can be achieved. The proposed development does not make adequate provision for the parking of vehicles clear of the highway or for suitable works that will mitigate the effects of the traffic associated with the proposal. As such, in the absence of sufficient information in relation to these matters the impact of the development on the surrounding highway cannot be properly 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).

Ms Vicki Hirst
Pembrokeshire Coast National Park
Development Control
Llanion Park
Pembroke Dock
SA72 6DY

Ein cyf/Our ref: SH/2011/111396/02-L01

Eich cyf/Your ref: NP/11/180

Dyddiad/Date: 28 June 2011

Annwyl Ms Hirst/ Dear Ms Hirst

EIGHT LODGES AT MEADOW HOUSE HOLIDAY PARK, SUMMERHILL, AMROTH.

Thank you for inviting us to attend the Committee Site Inspection yesterday.

As you are aware the site has consent to discharge which we issued in the early 1980's. All existing groundwater discharge permits have to be reviewed by the 22 December 2012. This site has been identified as a priority as the discharge is to a borehole. This direct discharge to groundwater could enable sewage effluent to reach spring lines and the Amroth rapidly. Amroth is a Blue Flag Bathing Beach.

During the inspection the applicant's agent confirmed that a private package treatment plant could be installed to treat the foul drainage from these lodges and also the foul drainage from the rest of the site. As such, we have no objection to the proposal if the following condition is included on any planning permission issued.

Condition

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul water has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

Reasons

To protect water quality and prevent any deterioration in water quality and any potential deterioration in Water Framework Directive Classification.

We would advise the applicant's agents to contact us to discuss the way forward with regards foul drainage.

We would point out the following.

- The review is likely to establish that discharge to the borehole will need to be discontinued.
- We would suggest that a private package treatment plant discharging to a reed bed system or soakaway be considered.
- Percolation tests should be carried out to determine if the soil is suitable for a soakaway system and to calculate the area of land required for this secondary treatment.
- If the soil is unsuitable we would advise the applicant to consider constructing a suitable soakaway. Again the area of land needed will require consideration.
- Access will be required for regular maintenance of the system and de-sludging.
- Consideration will also need to be given to Building Control Requirements with regard the standard of the system and distances from buildings etc.
- A permit will be required for the discharge under the Environmental Permitting (England and Wales) Regulations 2010.

Please note that this catchment is overloaded with nutrients and as such we do object to any new Asiantaeth yr Amgylchedd Cymru/Environment Agency Wales Llys Afon, Hawthorn Rise, Haverfordwest, Pembrokeshire, SA61 2BQ. Llinell gwasanaethau cwsmeriaid/Customer services line: 08708 506 506

E-bost/Email: enquiries@environment-agency.gov.uk

www.environment-agency.gov.uk

discharges of foul drainage. In this case, where there is an existing discharge, our stance is based on being in a position to improve the current situation.

Soakaways are an acceptable method of surface water drainage, should ground conditions prove suitable. Please note that this method of drainage will require the approval of your Authority's Building Control Department. The applicant should also be encouraged to investigate additional sustainable drainage systems (SUDS), for example grey-water harvesting systems, green roofs etc, as advocated by TAN15 (July 2004). Further information on SUDS is available from www.ciria.org.uk and www.sudswales.com. In addition we request the following condition is included on any planning permission issued.

Permeable paving or gravel/pebble shall be used for any proposed drives, turning and parking areas, patios and garden paths to reduce the impact of the development on the natural environment in response to the Technical Advice Note TAN 15.

To prevent the increased risk of flooding and to and prevent any deterioration in water quality.

Site operators should ensure that there is no possibility of contaminated water entering and polluting surface or underground waters. Pollution prevention guidance is available on our website at http://www.environment-agency.gov.uk/business/ topics/pollution/39083.aspx. We request that the following condition is included on any planning permission issued.

No development approved by this permission shall be commenced until a Method Statement detailing all necessary pollution prevention measures for the construction phase of the development is submitted to and approved in writing by the Local Planning Authority.

Reasons

To protect water quality and prevent any potential deterioration in Water Framework Directive Classification.

The Method Statement shall identify as a minimum;

- storage facilities for all fuels, oils and chemicals
- construction compounds, car parks, offices etc
- details of surface water drainage arrangements to be installed to intercept and treat contaminated surface water run-off
- details of measures to ensure no polluting discharge from haul roads/disturbed areas
- details of the nature, type and quantity of materials to be imported on to the site
- measures for dealing with any contaminated material (demolition waste or excavated waste)
- identification of any buried services, such as foul sewers, so that they are protected
- details of emergency contacts, for example the Environment Agency Pollution hotline 0800 807 060.

The Method Statement should then be efficiently communicated to all contractors and sub-contractors (for example, via toolbox talks) and any deficiencies rectified immediately

Any facilities for the storage of oils, fuels or chemicals should be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound should be at least equivalent to the capacity of the largest tank, or the combined capacity of interconnected tanks, plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipe work should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.

We have no information regarding any ordinary watercourses in the area and flooding. We advise you to consult with your Drainage Department who may have information and local knowledge of the area. Should any information be forthcoming with regards flooding we are happy to offer further advice.

The applicant should be made aware of the following comments.

Any proposals that are likely to affect flow within a watercourse will require, in addition to planning permission, our prior consent. In addition, the culverting of a watercourse requires the prior written approval of the Local Authority under the terms of the Public Health Act 1936, and our prior written

consent under the terms of the Land Drainage Act 1991/Water Resources Act 1991. We seek to avoid culverting and our consent for such works will not normally be granted except for access crossings.

If any controlled waste is to be removed off site, then the site operator must ensure a registered waste carrier is used to convey the waste material off site to a suitably authorised facility. The Duty of Care Regulations for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate licensed disposal site and all relevant documentation is completed and kept in line with regulations.

If during construction or excavation works any contaminated material (including asbestos) is revealed then the movement of such material either on or off the site should be in consultation with Environment Agency Wales.

If any waste is to be used on site, the applicant will be required to obtain the appropriate exemption or authorisation from us prior to commencement.

It is important that any soil or hardcore which is imported onto the site is free of the seeds/root/stem of the invasive plant, Japanese Knotweed, the spread of which is prohibited under the Wildlife and Countryside Act 1981.

In accordance with the waste hierarchy, we wish the applicant to consider reduction, reuse and recovery of waste in preference to off site incineration and disposal to landfill during site construction.

If the applicant wishes more specific advice on waste issues they can contact our National Customer Contact Centre on 08708 506506, or look at the guidance on our website at http://www.environmentagency.gov.uk/business/ topics/waste/default.aspx.

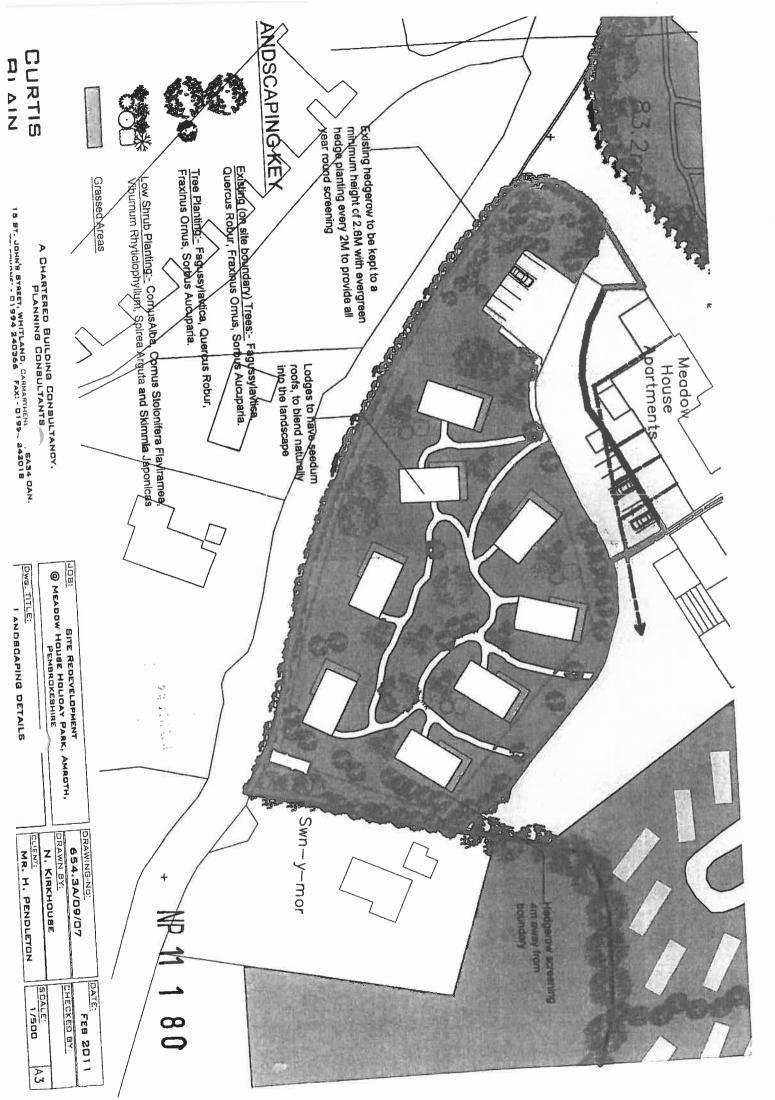
The developer is encouraged to go further in the design of their buildings to embrace water-saving measures, such as rainwater harvesting and storage, grey water re-use for toilet flushing (further advice can be obtained from our website at www.environment-agency.gov.uk/savewater) and use of materials that move towards a low carbon footprint. The latter could include procurement of materials from sustainable resources, micro-generation (wind and solar power) and use of efficient heating and insulation systems.

Yn ddiffuant / Yours sincerely

Ms Sharon Luke Planning Liaison Officer

Deialu uniongyrchol/Direct dial 01437 783011
Ffacs uniongyrchol/Direct fax 01437 783091
E-bost uniongyrchol/Direct e-mail Sharon.Luke@environment-agency.wales.gov.uk

cc Mr G Blain



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CURTIS Front Elevation L/H Elevation TH DT . INC. IN BYDGET. WHITLAND. CARMARTHENSHIRE. BASA DAN. A CHARTERED BUILDING CONBULTANCY.
PLANNING CONSULTANTS. Rear Elevation @ MEADOW HOUSE HOLDAY PARK, ANROTH, PEMBROKESHIRE R/H Elevation Bedroom DRAWING-ND: 654.3A/09/05 DRAWN BY: N. KIRKHOUBE \otimes NP 11 1 80 DATE:

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Living Area

Study

Bedroom

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CHECKED BY:

