

## Item 5 - Report on Planning Applications

**Application Ref: NP/15/0365/S73**

<b>Case Officer</b>	Kate Attrill		
<b>Applicant</b>	Dr T Hardman		
<b>Agent</b>	Mr D Middleton, Savills (UK) Ltd		
<b>Proposal</b>	Removal of Condition no. 5 of NP/10/141 to allow existing toilet block to be retained & used in conjunction with the caravan & camping site		
<b>Site Location</b>	Porthclais, Ffordd Porth Clais, St Davids, Haverfordwest, Pembrokeshire, SA62 6RR		
<b>Grid Ref</b>	SM2414		
<b>Date Valid</b>	24-Jun-2015	<b>Target Date</b>	18-Aug-2015

**Summary**

This application has been reported to the Development Management Committee at the discretion of the Head of Development Management and Director of Planning in view of the controversial nature of the original application NP/10/141 which was determined by the Development Management Committee with the requirement that the existing toilet block be demolished as required by Condition 5 of that permission.

Members may recollect that in April 2011 they granted planning permission for alterations to an existing agricultural building on the site to provide permanent toilet and shower facilities to complement the existing camping and caravan site, with a caveat that the removal of an unsightly and incongruous existing toilet block would be a planning gain to weigh in the balance.

The evidence supplied as part of this application to delete Condition 5 does not demonstrate that there is a permanent need for additional toilet facilities to be housed at the site. There is no justification for the Authority to depart from the planning permission granted in April 2011 for new facilities and as such the application is recommended for refusal.

**Consultee Response**

**St Davids City Council:** Reply - Further to the decision of the City Council taken at a meeting of 7th March 2011 in relation to the original application (NP/10/141) ...where it was resolved to support the application on the condition that the size of the new toilet block should meet the precise requirements 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. It was **RESOLVED** to refuse to support the removal of condition no. 5 on NP/10/141.

**PCC - Head of Public Protection:** No comment in relation to this application.

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### **Public Response**

The application was appropriately advertised by display of a site notice on 10 July 2015 at the site entrance. To date no letters of representation have been received.

### **Policies considered**

Please note that these policies can be viewed on the Policies page Pembrokehire Coast National Park website - <http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP Policy 01 - National Park Purposes and Duty  
 LDP Policy 08 - Special Qualities  
 LDP Policy 15 - Conservation of the Pembrokehire Coast National Park  
 LDP Policy 29 - Sustainable Design  
 LDP Policy 30 - Amenity  
 LDP Policy 40 - Site Facilities on Tent, Chalet and Caravan Sites  
 PPW7 Chapter 03 - Making and Enforcing Planning Decisions  
 PPW7 Chapter 04 - Planning for Sustainability  
 PPW7 Chapter 05 - Conserving and Improving Natural Heritage and the Coast  
 SPG05 - Sustainable Design  
 TAN 12 - Design  
 TAN 13 - Tourism

### **Constraints**

Special Area of Conservation - within 500m  
 Special Protection Area - within 500m  
 Site of Special Scientific Interest - within 50m  
 Heritage Coast - within 100m  
 LDP Mineral Safeguard  
 Biodiversity Issue  
 Historic Landscape  
 Safeguarding Zone  
 Rights of Way Inland - within 50m  
 Hazardous Zones  
 ROW Coast Path - within 10m  
 NPA Foreshore - within 25m  
 Nat Trust Covenants  
 Recreation Character Areas

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### Officer's Appraisal

#### **Background**

Porthclais Farm is located on the St David's 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.

The planning history (with the most recent first) goes back several decades.

#### **History**

- NP/14/0219 – Porthclais Farm, St Davids - Certificate of lawfulness for tents (see below) - Approved 5 August 2014
- NP/12/0546 – Porthclais Farm, St Davids - Use of building for purposes ancillary to operation of Porthclais Farm and Campsite (Certificate of Lawfulness) – Approved 20 August 2013
- NP/10/141 – Porthclais Farm, St Davids - Alterations to agricultural building to provide toilet/shower facilities – Approved 26 April 2011
- NP/99/065 – Porthclais Farm, St Davids - Use of the site for caravanning and camping (Certificate of Lawful Use or Development ) Approved – 1 March 2000
- NP/26/78 - Porthclais Farm, St Davids – Change of use to toilet block and meal store – Approved 8 March 1978
- HR 7618/62/271/1 – Porthclais Farm, St Davids – Use of land as caravan site – approved 4 August 1969

#### **Current Proposal**

The Authority granted planning permission for a new toilet block as part of application reference NP/10/141. This application proposed to upgrade facilities at the site and thereby improving the quality of the offer to visitors and to align the toilet needs with that required by the site licence. The scheme drawings submitted proposed that the existing toilet and washroom facilities would be decommissioned and demolished and that temporary porta cabin facilities that were then located on the site would be removed.

The application was considered by members of the Authority at the Development Management Committee meeting (copy of minutes, officer report and approved plans attached at Appendix 1).

It was determined that the removal of the existing toilet block coupled with the improvement to the modern agricultural shed would comply with the aims of policy 40 at ensuring that the scale and design of the facility is in keeping with

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the character of the surrounding area. Whilst the facility was already available it would result in its replacement with a new, more attractive, facility. As a result planning permission was granted subject to conditions, which included condition 5 requiring the demolishing and removal of the existing amenity block within 6 months of the approved amenity block being brought into use.

The reason given for the condition was to ensure a proper standard of development and appearance in the interests of conserving the amenities and architectural character of the area. Local Development Plan – Policy 1 – National Park Purposes and Duty (Strategy Policy), Policy 8 – Special Qualities (Strategy Policy), 15 – Conservation of the Pembrokeshire Coast National Park, 30 – Amenity and 40- Site Facilities on Tent, Chalet and Caravan Sites.

The planning permission, NP/10/141, has been implemented in so far as the shell of the building has been provided although the applicant advises that the internal fixtures and fittings have not yet been provided so that the new facility has not yet been brought into use.

The applicant's submitted Design and Access Statement provides an overview of the application and appears to suggest support for the removal of the condition on the following basis:

- Issuing of a Lawful Development Certificate in August 2014 of use of 4 fields for camping (up to a total of 200 tents, over the 4 fields)
- The existing toilet block and a new toilet block each lie within the main farm complex at Porthclais Farm and their retention will not materially alter the character or visual appearance of the site.

### **Key Issues**

The application raises the following planning matters:

- Policy and Principle of Development
- Justification for removal of condition

#### *Policy and Principle of Development*

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria 'd' and 'e' resists development that would fail to harmonise with, or enhance the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

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Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion 'd').

Policy 40 deals specifically with 'Site Facilities on Tent, Chalet and Caravan Sites' and states that the development of retail and 'other facilities' on tent, chalet and caravan sites will be permitted where (a) it can be demonstrated that the facilities 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 retail facilities, but rather the provision of other facilities, namely an amenity block.

The supporting text to this policy accepts that caravan and camping sites generally require good quality washing and toilet facilities but 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 that the scale of the facilities remains appropriate for their purpose. The grant of a site license is however not the determining factor. Rather the policy focuses on the impact on the character of the area and it is this that should be considered.

In terms of principle the Authority determined as part of planning application NP/10/141 that whilst there were existing facilities on site the proposal put forward was for new replacement facilities and demolishing the existing facilities, which together would effectively improve the quality of offer for the whole site and benefit the character of the surrounding area. On this basis and in light of the recommendations put forward by St Davids City Council, Members resolved to support the application on that basis that a condition was imposed to ensure that the existing building, which was considered to be unsightly and incongruous, would be removed within 6 months of the amenity block being brought into use. In addition to this other conditions relating to samples, materials and landscaping were imposed.

Given that this application now proposes removal of condition 5 there is a need to consider the justification put forward by the applicant having regard to the planning circumstances at the site.

### *Justification for removal of condition*

On 5 August 2014 a Certificate of Lawfulness was granted for the provision of a total of up to 200 tent pitches for the temporary summer season over four fields which overlook Porthclais inlet and St Brides Bay.

The Certificate of Lawfulness stated the following:

- Field 1: siting of up to 60 tents between Easter – 31st October
- Field 2: siting of up to 50 tents between 15th June – 31st October
- Field 3: siting of up to 60 tents between 15th June – 31st October
- Field 4: siting of up to 30 tents between 15th June – 31st October

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Officers were clear, having taken legal advice that the evidence provided was sufficient to demonstrate the use and that the provision of a certificate regularised the situation that had been undertaken on the land for in excess of 10 years. However, the number of tent pitches stipulated in the Certificate for each field was a 'maximum' which defined the spikes or peaks in usage which was known to have occurred at various peak times during the summer seasons,

The evidence demonstrated that the usage of these four fields was not constant throughout the summer months but that it was reasonable to conclude that the level of usage as set out in the certificate had been attained at some peak periods during the defined summer season. On that basis the certificate was issued, with a clear limit on the extent of proven usage, and the use of the words "up to" reflected the fluctuating levels of usage that were evident. It is clear that the peak periods are no more than the unlimited 28 days usage for which the applicant has permitted development rights, as was referred to in the original application for this toilet block and the certificate does not envisage any greater level of usage than was the case when the original permission, subject to the condition requiring removal of the existing toilet block, was considered and granted.

This application for the retention of the toilet block is however now made on that basis. The Design and Access statement (para 12.5) sets out that:

"the recent grant of a lawful development certificate (April 2014) to retain 200 tenting camping pitches over four field enclosures at Porthclais Farm has provided an added justification and requirement to retain the old (existing) toilet block. To this effect, the basis of this planning application has been discussed and agreed with the Department of Environmental Health who are fully supportive of this application as they recognize the need to provide adequate facilities for the whole caravan and camping site, whilst improving overall accessibility for the caravan and camping park."

It is correct that Pembrokeshire County Council has indicated in granting a site license under The Caravan Site & Control of Development Act that the sanitary facilities on site are not sufficient for the total number of tents and caravans permitted on site. They have indicated that if the number of facilities on the site were to be reduced due to the demolition of the existing incongruous and unsightly amenity block, as required by planning condition, then the number of tents must also be reduced & new licence conditions will be required.

However, it is not accepted that the site license establishes a need for permanent facilities to serve the permitted number of tents. The ancillary (toilet) facilities that are sought to be retained are provided within a permanent structure, considered to be unsightly and incongruous whilst the peak periods for which they are intended to serve are, on the applicants own evidence submitted in support of the certificate application, of a fluctuating, temporary and occasional nature. There has been no change in circumstances since the

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planning permission was granted in 2011 and the requirement to remove the old toilet block was accepted in that there was no appeal against the conditions imposed at the time or any application to vary the terms of the condition. The suggestion that the certificate and updated site license justifies the retention of permanent facilities is not accepted

Whilst there is an acceptance that there is a need to ensure hygienic and safe sanitary conditions for visitors – permanent facilities can only be supported if they do not have a detrimental impact on the special qualities of the National Park. If there is a need for further facilities during peak periods, as set out above these periods do not exceed 28 days in any given year, and the applicant is entitled to bring temporary facilities on to the site to cater for that need. That is a far preferable solution than the retention of the unsightly and incongruous toilet block. It is a solution that is commonly and successfully adopted by camping sites throughout the National Park. Indeed the applicant has in the past, prior to the approval of the original application relating to this structure, used small timber framed buildings for temporary periods successfully. Such means should be able to satisfy any site license requirement for further facilities. Alternatively, the site license would be revisited and the numbers of tents permitted reduced, as Pembrokeshire County Council have already made clear.

When the decision was made as part of application NP/10/141 for the new toilet block to be housed within an existing agricultural building, members were reminded that that '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'. The fluctuating, temporary and occasional nature of the use of the site for camping was therefore very much in mind at that time. The only potential change in circumstances since then is the grant of the certificate and the site license, but as set out above it is not accepted that this establishes a need for permanent facilities.

Allowing the retention of the existing toilet block would not comply with Policy 40. The original application was accepted to be of a scale and design which was in keeping with the character of the area, on the basis that the existing incongruous and unsightly structure was removed. Allowing the variation sought by this application would effectively provide 2 permanent toilet/shower blocks which are not justified and which would result in an unsightly and incongruous building being retained in addition to the new structure, to the detriment of the character of the area and the special qualities of the National Park.

### **Conclusion**

In the light of the planning background on this matter, the permanent nature of the application and the temporary, transient and occasional nature of the

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camping use of a substantial part of this camping site,, the conclusion is that the application is not justified in terms of any constant use requirements, is detrimental to the character of the National Park and would lead to further detriment of the special qualities of the National Park contrary to the aims and requirements of policies 1, 8, 15, 29, 30 and 40 of the Local Development Plan.

### **Recommendation**

Refuse for the following reason:

1. Condition 5 of planning permission NP/10/141 was imposed to complement the applicant's application drawings proposing replacement facilities and in order to ensure a proper standard of development and appearance to conserve the amenities and character of the area. Policy 40 allows new facilities only where it can be demonstrated that the facility is not already available in the area. Facilities were already available although the new toilet block provided an opportunity of improving the offer of facilities this was only considered to be acceptable in light of the removal of the existing facilities. As such a condition was imposed to require removal of the existing toilet block. The evidence provided as part of this application for the deletion of condition 5 does not demonstrate that there is a permanent need for retention of the additional toilet facilities to be housed within an existing building which was and is still considered to be unsightly and incongruous. As such the proposed removal of condition does not comply with the requirement of Policy 40 as the site will provide two amenity blocks, with the building now sought to be retained not being in keeping with the character of the surrounding area and detrimental to the special qualities of the National Park . As such the application fails to accord with the requirements of policies 8, 15, 30 and 40 of the Pembrokeshire Coast National Park Authority Local Development Plan (Adopted September 2010).



## Appendix 1

- Minutes of the Development Management Committee Meeting of 20<sup>th</sup> April 2011
- Officers Committee Report
- Approved Plans for NP/10/141

(ab) REFERENCE: NP/10/141  
 APPLICANT: Dr Thelma Hardman  
 PROPOSAL: Alterations to existing agricultural building to provide permanent toilet and shower facilities to complement existing camping and caravan site  
 LOCATION: Porthclais Farm, St Davids

Full planning permission was sought for the alteration of an existing agricultural building to provide replacement w/c and shower facilities on this camp site, which was also a working farm. Officers apologised for the fact that the plans for this and the following application had been displaced. The site had 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 benefitted from the '28 day' rule for an unlimited number of tent pitches at this location. In 2009 and 2010 retrospective applications had been 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 being withdrawn when the portacabins were removed from the site in September 2010.



The current proposal involved the remodelling of the western end of an existing portal framed agricultural shed. The amenity block would offer separate male and female toilet facilities, together with wash basins and showers. The central area would also include a unisex disabled shower and w/c, a baby changing unit, communal deep sinks and a cleaner's store cupboard. It was reported that the proposal had been amended since submission to reduce the amount of facilities being provided and also to include the removal of the existing amenity block on the site.

St Davids City Council supported the application on condition that the size of the new toilet block met the precise requirements of the site licence issued by Pembrokeshire County Council (PCC) and that the conditions for the removal of both the old and temporary facilities were precisely defined to follow completion of the new toilet block. A comprehensive representation of objection had been received from a near neighbour, whose main concern related to the proposed facilities being significantly greater than required by PCC and thereby allow a more intensive use of the site. An additional letter had been received since the report had been written and this had been distributed to Members prior to the meeting.

At the meeting, the Planning Officer advised that proposed Condition 4 of any consent would be amended to require removal of the existing amenity block within 6 months of the first usage of the new facility. He also noted that temporary w/c and shower facilities had again been brought on site and an application was in the process of being submitted. A report on this would be brought to a future meeting of the Committee.

Officers considered that the application, as amended, met 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 was therefore recommended for approval subject to a number of planning conditions to safeguard the character and amenity of the area.

**DECISION: That the application be approved subject to conditions relating to standard time limits, development in accordance with amended plans, finishes and samples of external finishes to be further agreed, removal of existing amenity block within 6 months of first usage of the approved amenity block, facilities to be used only by patrons of the camp site, the facilities within the new amenity block shall not be increased or added to in any way, landscaping in accordance with Pembrokeshire hedgebank detail.**

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Application Ref: 10/141

<b>Application Type</b>	Full
<b>Grid Ref:</b>	SM74392412
<b>Applicant</b>	Dr Thelma Hardman
<b>Agent</b>	Mr R Coy, Roger Coy Partnership
<b>Proposal</b>	Alterations to existing Agricultural Building to provide permanant Toilet and Shower facillities to compliment existing Camping and Caravan site
<b>Site Location</b>	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:

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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.

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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 18½m long by 4¾m 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

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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

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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.

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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

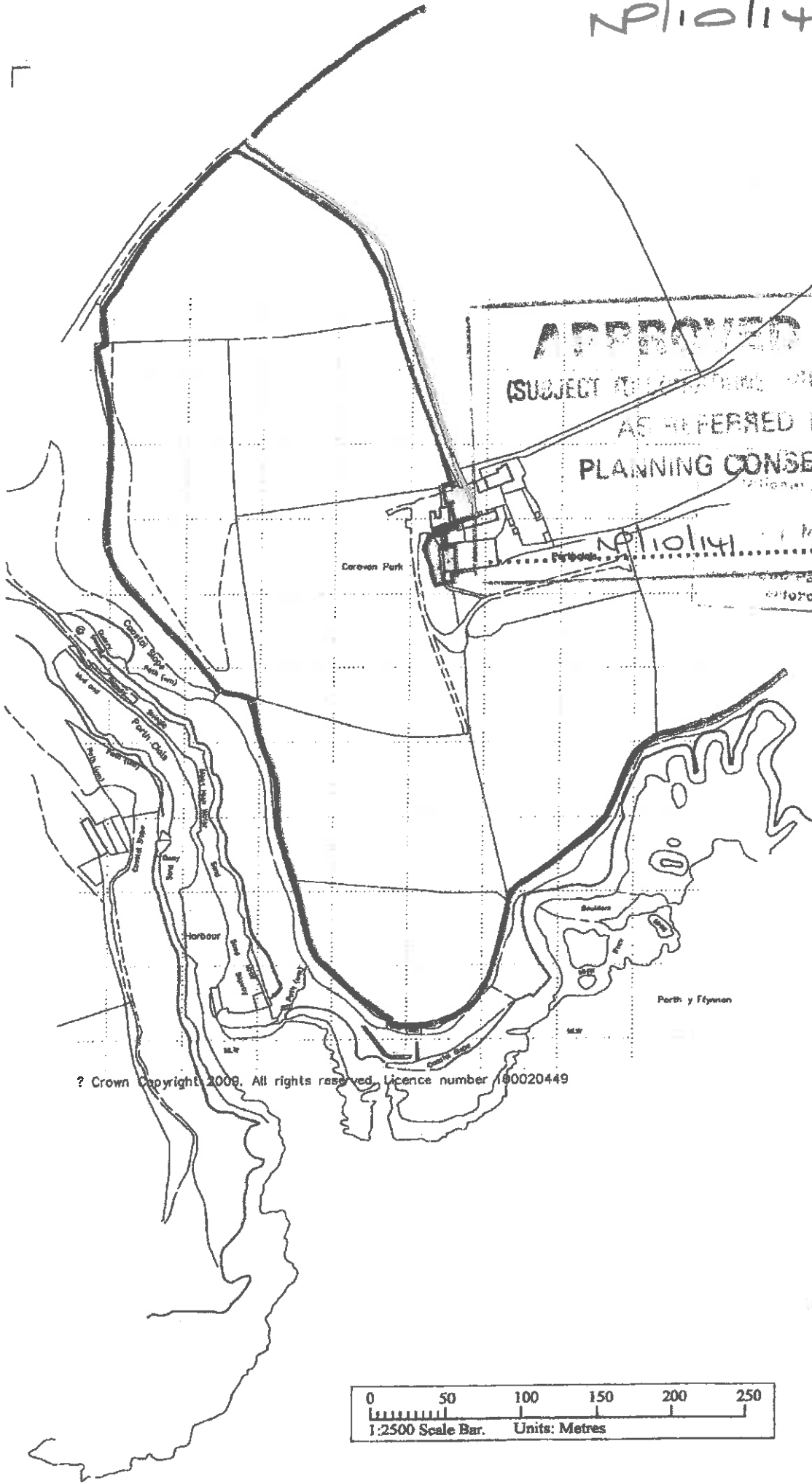


NP/10/14



THE CONTRACTOR IS RESPONSIBLE FOR CHECKING ALL DIMENSIONS ON THE GROUND TO REPORT ANY DISCREPANCY TO THE CONSULTANT PRIOR TO COMMENCEMENT OF ANY WORKS AND IS ALSO RESPONSIBLE FOR THE OBTAINING OF ALL NECESSARY SERVICES.  
THIS DRAWING IS COPYRIGHT AND NOT TO BE APPROVED BY THE PARTNERSHIP OF THE PARTNERSHIP.

**APPROVED PLAN**  
(SUBJECT TO THE TERMS WHERE APPLICABLE)  
AS REFERRED TO IN  
**PLANNING CONSENT REF.**  
NP/10/14  
1807/map



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DESIGNED BY  
Mr. Harman  
DRAWN BY  
Partholais Farm Composite  
Partholais  
St David  
Pembrokeshire  
PROPOSED DEVELOPMENT  
SURVEY DRAWING  
ORIGINATOR  
Ordnance Survey Extract  
SCALE  
1:2500 @ ASP  
DATE  
November 2009  
DRAWN BY  
Sam Butler

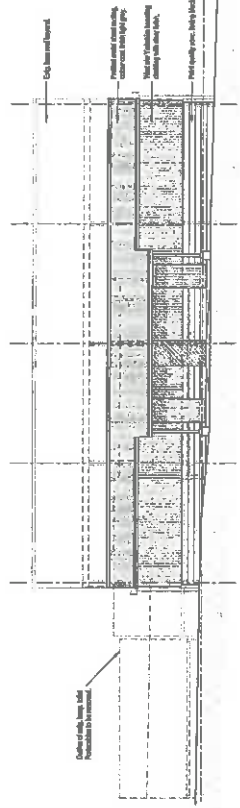
1807/map



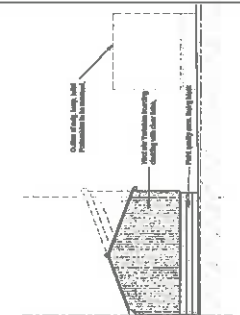
**ROGER COY PARTNERSHIP**  
ARCHITECTURAL  
TOWN PLANNING  
ENGINEERING  
AGRICULTURAL  
SURVEYING  
RICHMOND LANE 21 LIME AVENUE BISHOP  
DAVENRY NORTHAMPTONSHIRE NN11 1JG  
TEL: 01530 811270 FAX: 01530 811281  
EMAIL: RCOY@ROGERCOY.CO.UK



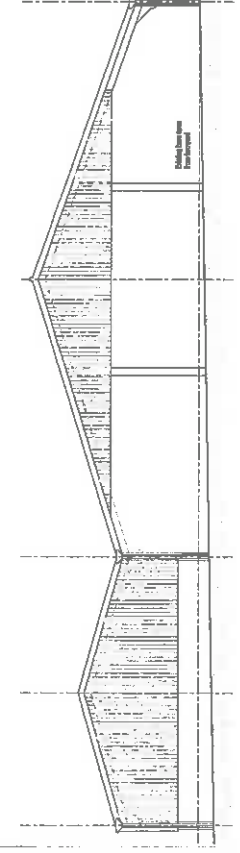
ALL DIMENSIONS ARE TO FACE UNLESS NOTED OTHERWISE.  
 DIMENSIONS TO FACE OF ALL EXISTING STRUCTURES ARE TO BE VERIFIED BY SURVEYOR.  
 DIMENSIONS TO FACE OF ALL PROPOSED STRUCTURES ARE TO BE VERIFIED BY SURVEYOR.  
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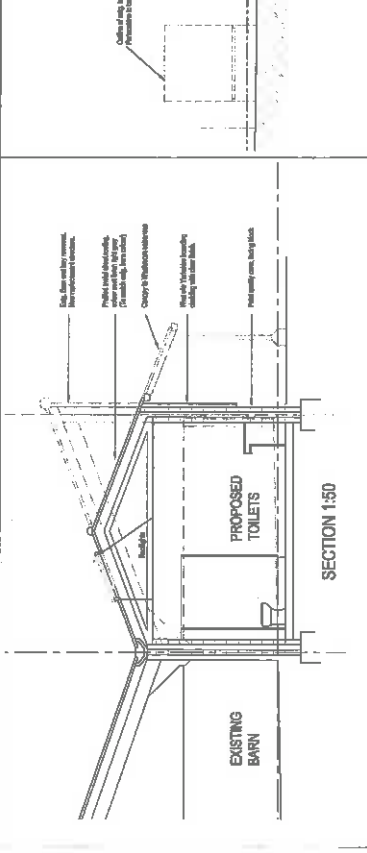
WEST ELEVATION 1:100



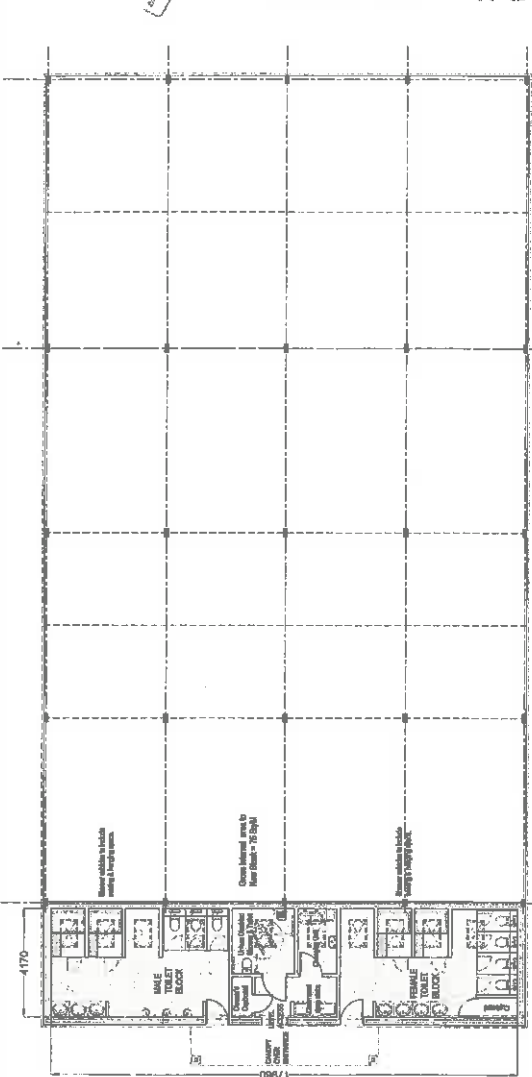
SOUTH ELEVATION 1:100



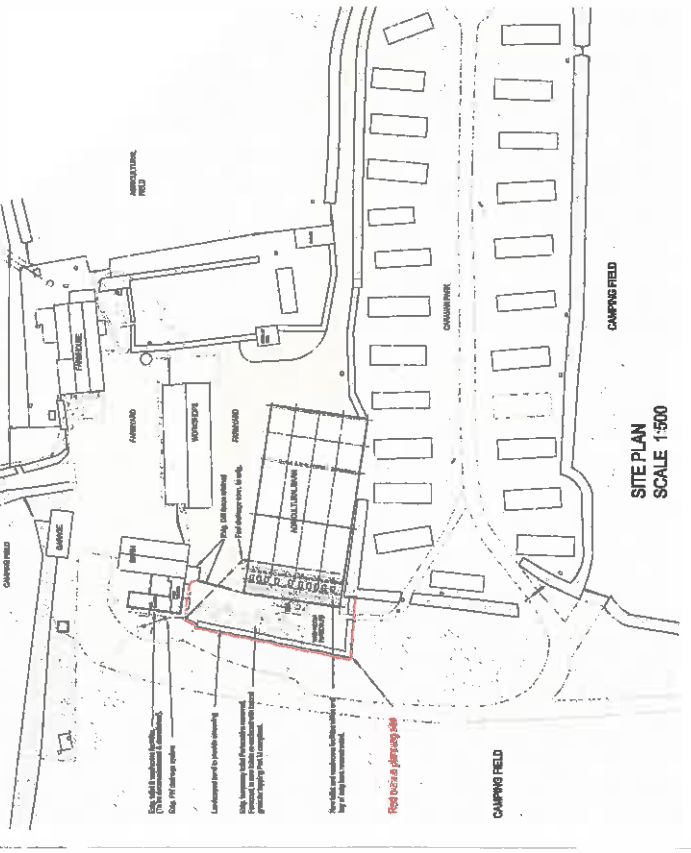
NORTH ELEVATION 1:100



SECTION 1:50



FLOOR PLAN PROPOSED SCALE 1:100



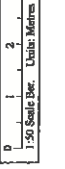
SITE PLAN SCALE 1:500



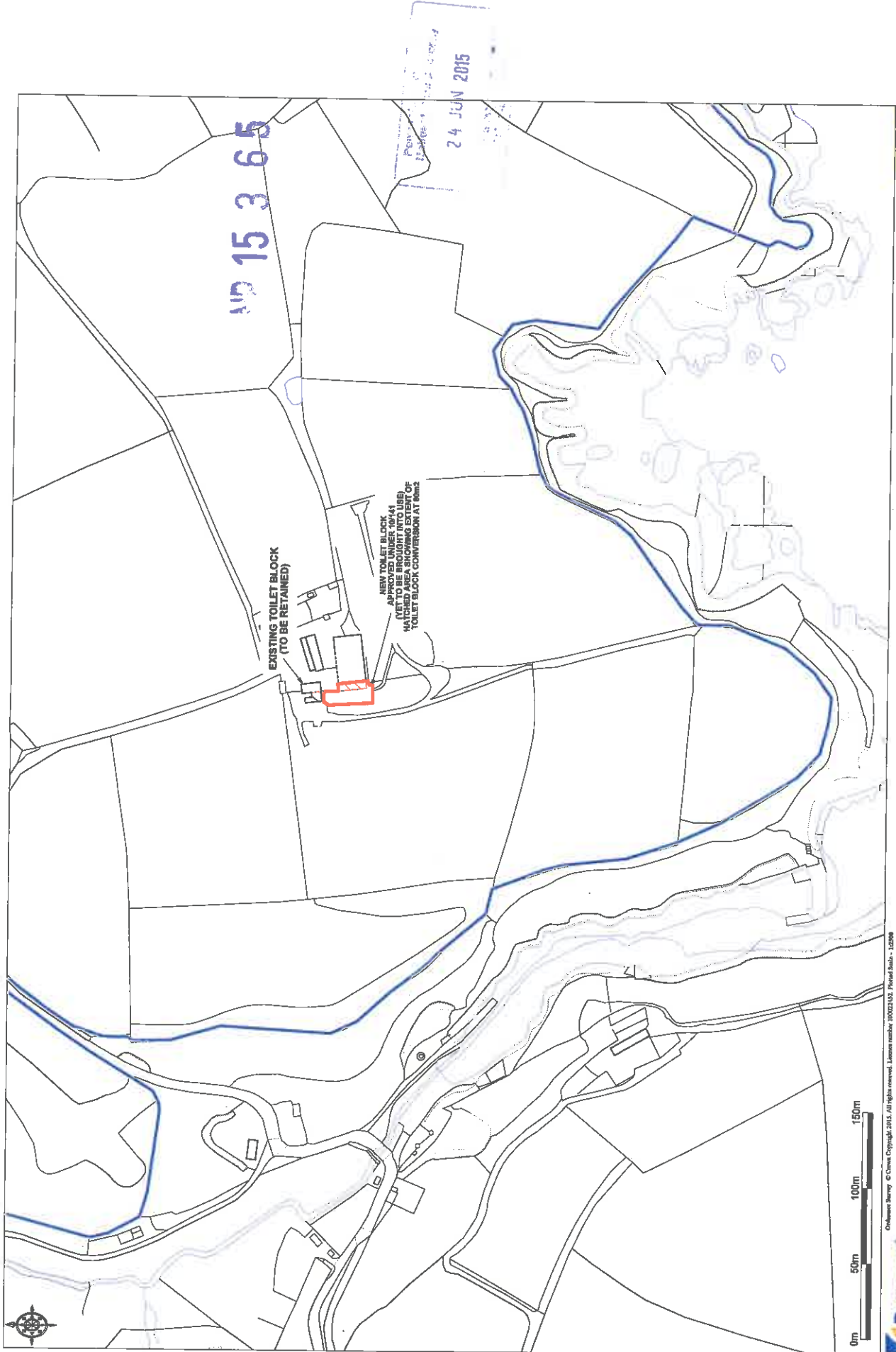
DAVID J. JONES  
 PROFESSIONAL ENGINEER  
 LICENSE NO. 17 FEB 2011  
 CIVIL ENGINEER  
 STATE OF CALIFORNIA

DR. T. THOMPSON  
 ARCHITECT  
 1785/21/B  
 ARCHITECT  
 STATE OF CALIFORNIA

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 STATE OF CALIFORNIA



**1:2500 LOCATION PLAN  
APPLICATION SITE WITH LAND OWNERSHIP**



**PORTHCLAIS CARAVAN AND CAMPING SITE, ST DAVIDS, PEMBROKESHIRE, SA62 6RR  
ST DAVIDS, PEMBROKESHIRE SA62 6RR**



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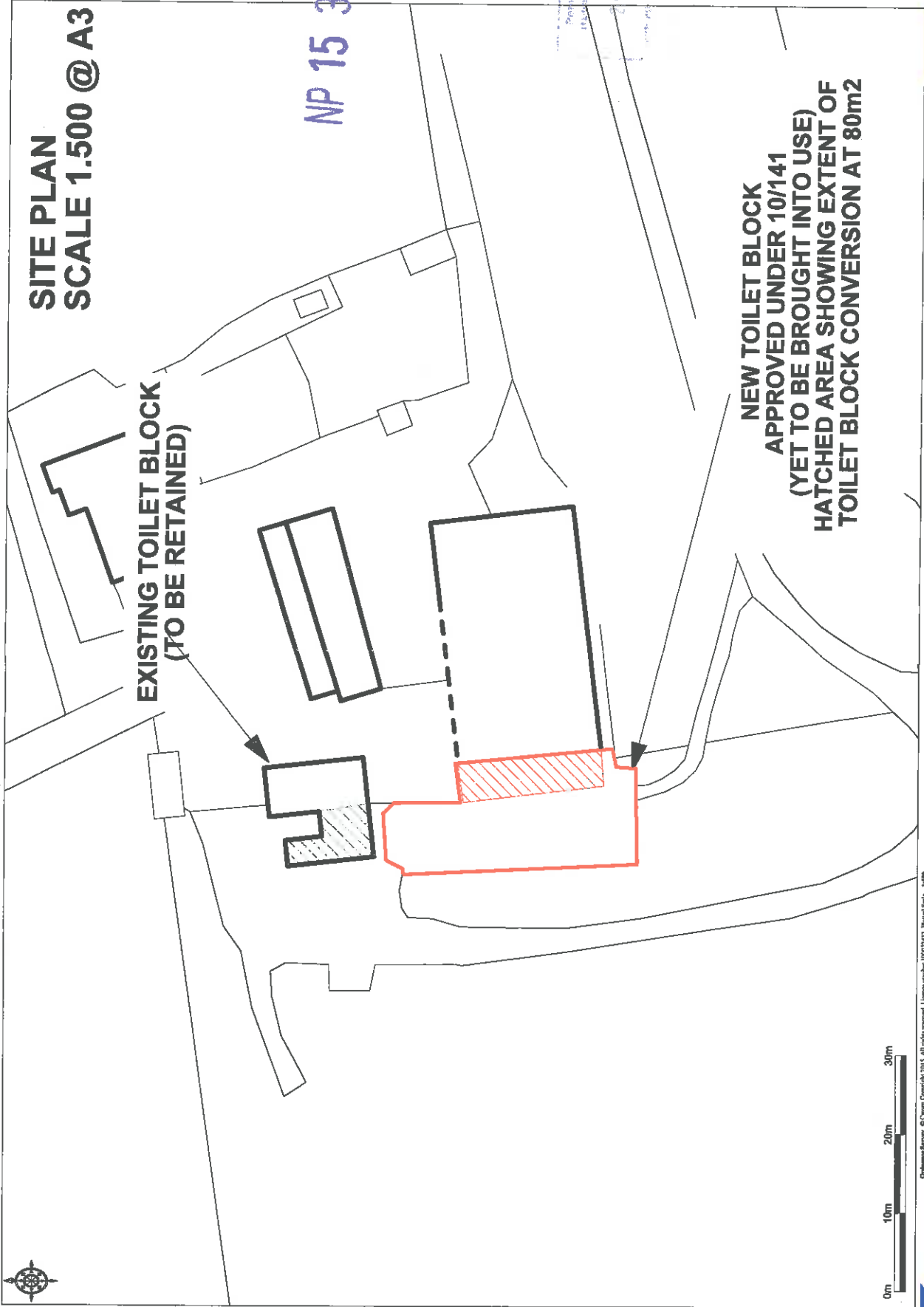


**SITE PLAN  
SCALE 1.500 @ A3**

NP 15 3 65

**EXISTING TOILET BLOCK  
(TO BE RETAINED)**

**NEW TOILET BLOCK  
APPROVED UNDER 10/141  
(YET TO BE BROUGHT INTO USE)  
HATCHED AREA SHOWING EXTENT OF  
TOILET BLOCK CONVERSION AT 80m2**



**PORTHCLAIS CARAVAN AND CAMPING SITE, ST DAVIDS, PEMBROKESHIRE, SA62 6RR  
ST DAVIDS, PEMBROKESHIRE SA62 6RR**

**savills**

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