Application Ref: NP/15/0338/FUL

Case Officer  Caroline Bowen
Applicant     Mrs B Price, Quinquiri Marine Ltd
Agent
Proposal     Temporary use as car park for April 1st to October 31st for 3 years (2015, 2016 & 2017)
Site Location  Rhosson Campsite, St Justinians
Grid Ref      SM72992528
Date Valid    12-Jun-2015  Target Date  06-Aug-2015

Summary

This planning application is reported to Committee, as per the previous applications, due to the sensitivity of the site and issues raised in respect of the wider traffic management of St Justinians.

This planning application seeks the renewal of a temporary consent for use of land at Rhosson as a car park for customers accessing boat trips from St Justinians, during the period 1st April to 31st October for three years. Earlier consents have been granted in 2006 (two years), 2008 (two years) and 2010 (three years), and the 2010 consent was granted in the proviso that progress was to continue with all partners having an interest at St Justinians to improve an alternative means of access to this area, and to eliminate the need for further similar permissions at this site.

Following consultation, nine letters of support have been received, and no objections have been received from the City Council, Highways, Common Land Officer, NRW and Dyfed Archaeological Trust. A letter of objection has been received, which raises concerns in respect of the impact of the car park on the setting of the adjacent listed buildings, and the Authority’s Building Conservation Officer has also recommended refusal for the same reason.

Officers acknowledge that there is an established tourism business being carried out at St Justinians, and have considered in detail the responses provided which are in support of the proposal; together with the fact that previous temporary permissions have been granted to allow a more sustainable means of access to St Justinians to be developed.

However, an alternative proposal for managing traffic has not come to fruition, and there are now a number of external issues that have a bearing on the likely longevity of the business use being carried out at St Justinians which should be taken into consideration in respect of considering a further temporary permission.

This temporary car park has become a feature in the wider landscape setting as there are physical structures and signage in place, and the continuation of this use is considered to have an adverse impact on the setting of the adjacent listed buildings, Rhosson Chapel (Grade 2) and Rhosson Farmhouse (Grade 2*). In light of this, officers consider that there is
insufficient evidence provided to support a further period of consent, and that
the continued presence of the car park and its associated fencing, ticket
machine and signage has a harmful effect on the setting of the listed
buildings. In light of this, the application is recommended for refusal.

Consultee Response

St Davids City Council: Supporting
PCNPA - Park Direction: The reports on previous applications for this site
clearly set out Officer and Member concerns about the impact of a car park at
this location on the special qualities of the National Park. The over-riding
reason in each case has been to give the applicant and Authorities time to
develop a more sustainable means of access to St Justinians.

Whilst the applicant did experiment with operating a bespoke bus service this
has not continued and reliance on a car park for boat passengers appears to
be their preferred option. No evidence has been submitted with the current
application to explain what other alternatives have been considered/ tried and
why the current approach is the preferred approach.
Natural Resources Wales: No objection
Dyfed Archaeological Trust: No objection
PCC - Transportation & Environment: Conditional Consent
PCC - Ecologist: No adverse comments
PCC - Common Land Officer: No adverse comments
PCNPA - Buildings Conservation Officer: Recommend Refusal

Public Response

The application was advertised both as an application, and also in respect of
its impact on the setting of a Listed Building. One letter of objection was
received, who raised concerns that the introduction of the car park at this
location has impacted on the setting of the listed buildings through the greater
activity by cars and traffic, noise pollution arising from the use and the impact
from the physical car park features. 9 letters of support have been received to
the proposal, which, in summary, state that;

- The access road to St Justinians is busier as a result of the
  construction of the new RNLI buildings, together with being the only
  access to the lifeboat station.
- Summer traffic at St Davids continues to grow, and car-parking within
  the City is inadequate, causing visitors to park in nearby residential
  areas.
- If visitors travelling to St Justinians to go on boat trips are no longer
  able to use the car park, they will inevitably fly-park on St Justinians
  road itself or will exacerbate the parking problems in St Davids.
- The Celtic Coaster has problems staying to a defined schedule during
  the summer months due to the level of traffic – it, therefore, could not
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be relied upon to serve the current schedule for boat trips at St Justinians.

- The car park was closed as an experiment and chaos very quickly followed. People who paid to visit Ramsey Island had no choice other than to park along the road, the farm entrance and holiday cottages, which blocked traffic.

Policies considered

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

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 07 - Countryside
LDP Policy 08 - Special Qualities
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 30 - Amenity
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW7 Chapter 03 - Making and Enforcing Planning Decisions
TAN 12 - Design
TAN 23 - Economic Development

 Constraints

Special Area of Conservation - within 500m
Site of Special Scientific Interest - within 50m
Common Land CROW Access
LDP Mineral Safeguard
Biodiversity Issue
Historic Landscape
Safeguarding Zone
Hazardous Zones
Nat Trust Covenants
Recreation Character Areas

Officer’s Appraisal

Background and site description

The application site is an area of agricultural land, located approximately 1.5 kilometres to the west of St Davids, on the southern flank of the single-track rural road linking St Davids to St Justinians. The area of land, subject of this application, falls outside of any Centre or Rural Centre boundary as defined for the purposes of the Pembrokeshire Coast National Park Local Development Plan.

The land is mainly flat in profile, and is served by an access which lies between Rhosson Chapel and Rhosson Farmhouse – both of which are listed
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buildings. In the immediate setting, there is a timber fence to the west of the entrance, a ticket machine to the east, and existing signage on the Pembrokeshire hedgebank fronting the road. In the wider setting, the car park can be seen against the backdrop of Rhosson Farmhouse and the rocky outcrop to the south.

Planning History

- NP/10/327 – Seasonal car park (temporary for 3 years until end of 2012) Renewal of consent. Approved.
- NP/08/210 – Temporary car park (2 years) – Approved.
- NP/06/215 – Temporary car park and bus turning area (2 years). Approved.

Constraints

- LDP Mineral Safeguard
- Common Land
- Biodiversity
- Historic Landscape
- Safeguarding Zone
- Hazardous Zones
- National Trust Covenants
- Recreation Character Area
- Listed Building within 10 metres

Current proposal

Planning permission is sought for the renewal of temporary consent for a car park at Rhosson campsite, to provide parking facilities for visitors accessing boat trip at St Justinians.

Key issues

- Policy and principle of development
- Siting
- Amenity
- Access
- Landscaping
- Biodiversity
- Other material considerations

Policy and principle of development.

Policy 52 of the Local Development Plan allows proposals that assist in delivering improved traffic and parking management, and facilities to improve public transport by helping to link between travel modes or providing facilities for passengers. Proposals that cause significant concerns about potential
transport impacts which cannot be satisfactorily mitigated will not be permitted, as set out in Policy 53. These include where significant environmental damage would be caused and cannot be mitigated.

The reports for the previous applications have set out officer concerns at the impact of a car park at this location on the special qualities of the National Park, which include the sense of remoteness and the historic environment; with permission only granted to allow the boat owners and the tourism businesses to provide a long term sustainable solution to access.

The applicant has indicated that they trialled a bespoke bus service, but has not continued this. The Coastal Cruiser provides a half hourly service during the summer peak season, however, due to delays meeting the schedule in summer, it is not considered to be an acceptable alternative to meet the business's requirements. This is the fourth application for temporary consent, and officers are concerned that this use would then have been in operation for nearly 10 years with no progress being made to achieve a sustainable approach to handling visitor traffic to and from St Justinians.

In light of this, a further permission would not help to resolve this issue, and the car park takes on an ever permanent place in the landscape, which is harmful to the special qualities of the National Park.

Siting

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. This policy is supported by supplementary planning guidance on landscape assessment – the application site falls within LCA 18 – St Davids Headland, which is identified as a large tract of rolling lowland, and associated coastal area of cliffs and beaches. The SPG notes that this is largely a rather peaceful open rural environment containing internationally significant habitats and with a wealth of historic and archaeological features, including some fine examples of the distinctive vernacular Pembrokeshire houses with their 'outshuts' and massive round chimneys. The area is also designated a St David's Headland and Ramsey Island registered Landscape of Outstanding Historical Interest in Wales.

Policy 15 of the LDP seeks to conserve 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.

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that

The car park area is unrelated to the adjacent farmhouse, and stands alone as a landscape feature. It is removed from the sensitive coastal edge, but does fall in a very flat landscape setting, and thus, when in use is a

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discernable feature in the wider landscape setting. The car park entrance falls to the front of Rhosson Farmhouse, a Grade 2* listed building, and the timber fence and signage are seen against the main frontage of the farmhouse in views from the public realm. Even though the use of the car park is seasonal, the signage and fencing are permanent landscape features, and these have an adverse impact of the setting of the adjacent listed building.

Amenity

Policy 30 seeks to avoid development that is inappropriate for where people live or visit, of an incompatible scale with its surroundings, leads to an increase in traffic/noise/odour or light which has a significant adverse impact, or is visually intrusive.

Given the nature of the development, the impact is considered to be upon the physical amenity of the surrounding buildings and landscape setting. As above, whilst the car park use itself would be seasonal, the physical features of the fencing and signage are not, and these are considered to harm the rural landscape setting and setting of the adjacent Rhosson Farmhouse. In terms of use, whilst the car park can be considered to provide a solution to parking, it does not address the harm that is likely to be created by large volumes of traffic within a summer season, which has an impact on amenity to the residents of the headland.

Access and parking

The existing access and area for parking will be unaltered. The Highways Development Control Officer was consulted and advised conditional consent.

With regard to the letters of support, there is recognition that these issues do exist, but that the continuation of a car park on a temporary permission has not actually resulted in any long term sustainable solutions being sought by those businesses which would benefit from such a solution. In answer to the issues raised by the letters of support:

- The access road to St Justinians is busier as a result of the construction of the new RNLI buildings, together with being the only access to the lifeboat station.

This is a temporary result of construction. It is the 'busier' element which any long term transport strategy should be addressing.

- Summer traffic at St Davids continues to grow, and car-parking within the City is inadequate, causing visitors to park in nearby residential areas.
  This is not actually the case, and the applicant has not provided evidence to support this. There is an argument for a more streamlined tourism offer, whereby boat trippers purchase tickets in St Davids and then take organized transport to their destination from St Davids.
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- If visitors travelling to St Justinians to go on boat trips are no longer able to use the car park, they will inevitably fly-park on St Justinians road itself or will exacerbate the parking problems in St Davids. We agree with this, and therefore the requirement for a long term sustainable, easily understood travel plan for the boat trippers is deemed essential if the National Park’s economy is to benefit from this tourism trade and the landscape is not denigrated by a stand alone temporary car park which has a significant impact on this important peninsula.

- The Celtic Coaster has problems staying to a defined schedule during the summer months due to the level of traffic – it, therefore, could not be relied upon to serve the current schedule for boat trips at St Justinians.
  The boat owners and car park owner need to work closely together to establish transport links which enhance the visitor experience and provide a long term solution to this problem. Submitting an application in isolation without the travel ‘jigsaw’ pieces being recognised and solved merely exacerbates the transport issues along this single track lane.

- The car park was closed as an experiment and chaos very quickly followed. People who paid to visit Ramsey Island had no choice other than to park along the road, the farm entrance and holiday cottages, which blocked traffic.
  We are aware that this would have been the result – and this is why the car park owners and the boat owners were granted temporary consent originally to come to a long term sustainable solution to this matter.

**Landscaping**

No new landscaping is proposed.

**Biodiversity**

The application site is within an area where biodiversity is a known constraint. The Authority’s Ecologist was consulted on the proposal, and advised that she had no comment for this application.

**Other material considerations**

- **Historic Landscape.**
  The application site falls within a landscape designated for its historic interest – Dyfed Archaeological Trust were consulted and recommended no objection.

- **The wider context at St Justinians.**
  At the moment, the new RNLI station is under construction, with the former station being actively marketed for sale. Officers’ understanding is that the boat owners have an arrangement to launch from the RNLI slipway, but this would be only as long as the RNLI continue to hold the lease.
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With the former station being marketed, there is uncertainty about the future operation of businesses, therefore it is now considered premature to continue with the temporary car park as there may in fact be no tourism offer from St Justinians in the near future.

Conclusion

Officers acknowledge that there is an established business being carried out at St Justinians, and have considered in detail the responses provided which are in support of the proposal; together with the fact that previous temporary permissions have been granted to allow a more sustainable means of access to St Justinians to be developed.

Despite meetings with the applicant regrettably, they have not provided an alternative proposal for managing traffic, and there are a number of external issues that have a bearing on the likely longevity of the business use being carried out at St Justinians which should be taken into consideration in respect of considering a further temporary permission.

The car park has become a discordant feature in the wider landscape setting as there are physical structures and signage in place, and the continuation of this use is considered to have an adverse impact on the setting of the adjacent listed buildings, Rhosson Chapel (Grade 2) and Rhosson Farmhouse (Grade 2*). In light of this, officers consider that there is insufficient evidence provided to support a further period of consent, and that the continued presence of the car park and its associated fencing, ticket machine and signage has a harmful effect on the setting of the listed buildings. In light of this, the application is recommended for refusal.

Recommendation

That the application be refused for the following reasons;

1. Insufficient evidence has been submitted with the application to support the granting of further temporary permission for the car park, therefore the application does not give sufficient detail for the full consideration of the proposal. The application would, therefore, be contrary to the Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), 52 (Sustainable Transport) and 53 (Impacts of Traffic).

2. No comprehensive traffic management scheme to accommodate the boat trippers visits to St Justinians has been submitted with the application, to enable the full consideration of the proposal. The application would, therefore, be contrary to the Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), 52 (Sustainable Transport) and 53 (Impacts of Traffic).

3. The proposal is premature in that there is no information in respect of the securing of long term launching facilities at St Justinians, which
would justify a further grant of planning permission. The application would, therefore, be contrary to the Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), 52 (Sustainable Transport) and 53 (Impacts of Traffic).

4. The proposal would result in a detrimental impact on the setting of the adjacent Listed Buildings, and would be harmful to the special landscape character of this location in the Pembrokeshire Coast National Park. The application would, therefore, be contrary to the Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), together with Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5. The application has not been supported by a landscaping scheme to mitigate the impact on the listed buildings, and on the wider landscape setting. The application would, therefore, be contrary to the Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), together with Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.