Item 5 - Report on Planning Applications

Application Ref: NP/15/0069/FUL

Case Officer: Caroline Bowen
Applicant: Mr & Mrs N & M Macalast
Agent: Mr C Kimpton, CK Planning
Proposal: Retrospective application for camping/touring caravan site plus ancillary facilities and change of use part of Noddfa Farmhouse for visitor toilets and shower facility
Site Location: Noddfa Farm, Llanrhian, Haverfordwest, Pembrokeshire, SA62 6DP
Grid Ref: SM81283086
Date Valid: 09-Feb-2015  Target Date: 05-Apr-2015

Summary

The application site is a detached dwelling and associated land located in a countryside setting, west of the village of Llanrhian. Planning permission is sought in retrospect for the use of the land adjacent to the dwelling as a campsite, together with the provision of ancillary facilities comprising an external fridge and wash area, and washrooms within the existing dwelling itself.

Following consultation, 3 letters of objection, and approximately 34 letters and emails of support have been received.

The proposal has been considered against the policies of the current Local Development Plan, and whilst the applicant has put forward strong reasons for the retention of the campsite in this particular instance, the main policy – 38 – Camping, Touring Caravans, Statics and Chalet Sites - which is relevant to this proposal, is not a criteria-based policy, and makes clear that no new camping sites would be supported. As a result, the material considerations put forward by the applicant do not outweigh the very clear policy position regarding such developments. As such, the application is not supported by officers, and the recommendation is of refusal.

Consultee Response

PCNPA - Park Direction: This application is contrary to the Local Development Plan Policy 38 which remains to be supported by up to date evidence and also in line with the most up to date local tourism vision.

Natural Resources Wales: No objection - to the proposal, subject to the applicants registering for either a water quality exemption for the method of private foul water disposal, or an environmental permit. The Planning Advice Note was provided.

PCC - Access Officer: No objection - on planning grounds.

PCC - Transportation & Environment: Conditional Consent - No objection, subject to conditions relating to the requirement for new visibility splays, no
growth or obstruction to visibility and the parking facilities retained for that purpose.

**Llanrhian Community Council**: Approve - Whilst the application is contrary to the PCNPA Local Development Plan, the Community Council felt that the material consideration of visitors to the site bringing valued income to the local area should be taken into account and approved of the application.

**PCC - Ecologist**: No adverse comments

**Public Response**

A site notice was posted in accordance with statutory requirements, and neighbouring properties notified by letter. 3 letters of concern, and 35 letters/emails of support were received, and, in summary, raised the following issues;

- Brings customers to the North Pembrokeshire coast and business to the local community.
- The business will benefit the local area and as a small campsite it provides a great camping experience looking over the rolling hills.
- The farm lends itself well to use as a campsite.
- A wonderful base from which to explore North Pembrokeshire and all its beauty.
- The site was in a beautiful location and should be available for tourists to enjoy the wonderful surroundings in this beautiful county.
- We feel that to close a site like this would be severely detrimental to business in the surrounding area.
- Concern that the proposal would impact on the bat roost at Trewacoyn.
- Concern that there would be inadequate facilities to treat foul water drainage from the campsite.
- Close to the remote beaches and the coastal path, yet still have access to local facilities at Aberreiddi, Porthgain and Trefin.
- There are limited employment opportunities in Pembrokeshire.
- Supporting individuals to develop their own income sources, especially in ways that bring extra income into the area, which subsequently helps other Pembrokeshire residents to support themselves should only be encouraged.
- Concern that the intensification of use proposed by the applicants is inappropriate given the existing infrastructure there to deal with sewerage. The existing system was originally designed to accommodate the house, but now will also serve the 24 pitches as set out in the application. Clearly there is a significant risk that this will overload the existing infrastructure and soakaways, and will drain into a neighbouring stream which is used by livestock to drink from.
- Concern that the boundary stock fencing is not a safe boundary between the campsite and the beef cattle kept on adjacent land.
- The land slopes away behind the house, so most of the site is invisible from the road, thus not spoiling the scenic nature of the area.
- Concern in respect of noise and disturbance from visitors to the campsite.
Policies considered

Please note that these policies can be viewed on the Policies page Pembroke 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 11 - Protection of Biodiversity
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 30 - Amenity
LDP Policy 32 - Surface Water Drainage
LDP Policy 35 - Visitor Economy
LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites
LDP Policy 53 - Impacts on traffic
PPW7 Chapter 03 - Making and Enforcing Planning Decisions
PPW7 Chapter 07 - Economic Development
PPW7 Chapter 11 - Tourism, Sport and Recreation
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 13 - Tourism
TAN 23 - Economic Development

Constraints

LDP Mineral Safeguard
Biodiversity Issue
Safeguarding Zone
Hazardous Zones
Recreation Character Areas

Officer’s Appraisal

Background and site description

The application site is located on the northern flank of the minor rural road linking St Davids to Llanrhian. The site falls outside of any Centre or Rural Centre Boundary, as defined in the Pembrokeshire Coast National Park Local Development Plan, and is in open countryside for policy purposes. The area of land, subject of this application, falls within the existing boundary for the property, Noddfa.

The site comprises a detached, two-storey farmhouse with extensions to the rear. The dwelling is subject to an agricultural tie condition and sits in
surrounding land of approximately 2.5 acres in extent. There are a number of small ancillary outbuildings close to the main house, a large gravelled drive and parking and a large pond to the north of the house. The land slopes down in profile to the north west. The site is bounded by open fields to the north, east and west. The complex of buildings known as Trevacoon lies to the south of the site, as is the nearest neighbour.

This planning application has been submitted in response to investigations carried out by the Authority’s Enforcement Officers. The use started in April 2013 as a 28 day permitted development right for temporary use.

Planning History

- NP/12/0062 – Granny Annexe. Approved 16th March, 2012

Constraints

- LDP Mineral Safeguard
- Biodiversity
- Safeguarding Zone
- Hazardous Zone
- Recreation Character Area

Current proposal

Planning permission is sought for the retention of the following works:

- The creation of 24 camping/touring caravan/camper van pitches (only 4 of which will be available for touring caravans or campers).
- The creation of 12 visitor car parking spaces to the immediate north-east of the farmhouse on the existing gravelled area. An additional 18 spaces are available with a number of the pitches themselves.
- The provision of 6 electricity hook up points.
- The creation of a ground floor washroom within the main house, and use of an existing ground floor bathroom for visitors.
- The provision of an external fridge and outdoor washing up area.

Key issues

- Policy and principle of development
- Amenity and privacy
- Access, parking and Highway Safety
- Drainage
- Biodiversity
- Other material considerations
Policy and Principle of development

Policy 7 states that development in the countryside will only be permitted where it would fall into one of eight categories. Criterion (e) allows tourist attractions or recreational activity where the need to locate in the countryside is essential.

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 20 – Trefin, which is a large linear coastal area where the hinterland is a gently undulating agricultural landscape with a close visual relationship with the adjacent coastline. The area has a pattern of regular scattered farmsteads and occasional hamlets and small villages. The SPG notes that management and intensity of the farmed landscape is largely appropriate for the agricultural nature of this area.

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. It further resists development that would not be compatible with its location (criterion ‘c’), fail to harmonise with, or enhance the landform and landscape character of the National Park (criterion ‘d’).

Policy 30 seeks to avoid development that is visually intrusive (criterion’d’).

Policy 35 reiterates Policy 7 and states that visitor attractions, recreational and leisure activities in the countryside will need to demonstrate why a countryside location is essential.

Policy 38 states that in the National Park, new camping, caravanning static caravan or chalet sites will not be permitted.

The site is not considered to have a harmful appearance in the landscape—the main use is for camping, which would generally mean that tent structures would come and go, as opposed to being permanent features of the landscape. The ground levels of the surrounding land vary, and there are mature trees and hedges surrounding and within the site, which offer screening and shelter. The land offers an aspect to the north over farmland and to the coast. The site relates well to the existing farmhouse. Policy 38 is not criteria-based, and is clear in that no new permanent camping sites would be allowed in the National Park. The context of this policy is set out in paragraph 4.168 of the LDP—the majority of caravan and camping sites are concentrated in the National Park, which occupies only 37% of the total land area of the County. In light of this, the proposal would not comply with policy 38 of the Local Development Plan, and cannot be supported. However, temporary ‘28 day rule’ uses would be allowed as permitted development.
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Amenity & Privacy

In respect of amenity, the application states that the site would operate between April and September in each calendar year, therefore it is a seasonal business which can return to its original undeveloped character during the winter months with no lasting impact on the landscape. The closest residential property lies to the south of this site and provides self-catering cottages.

The Environmental Health Section of Pembrokeshire County Council had asked to be consulted on this proposal. However, no further response has been received to this application.

Access, Parking and Highway Safety

The site itself is served by a bus route – 404: Strumble Shuttle, which passes by the site six times a day during the summer. The site has an existing access off the minor rural road, which leads into a large gravelled drive. The Highways Development Control Officer was consulted, and recommended conditional consent, advising that 'the proposal is to use the existing access to the farmhouse over the cattle grid and past the car parking area down the plots within the field. This will be a substantial increase in traffic using this access and warrants a visibility improvement. Particularly with regard to the type of traffic now involved. The sight line splays indicated on the plans cannot be approved as the splays do not follow the edge of the carriageway but leave major blind spots in each direction. The splays indicated must, therefore be over-ridden with strict planning conditions, with the accurate wording, and they will not be achieved unless the stone walls on each side of access are partially demolished. Only minor alterations to the banks will be required beyond this.' On this basis, there are no objections to raise on highway impact grounds.

Drainage

The site is served by washroom and toilet facilities which are provided within the existing farmhouse, and the applicant indicates that surface water will be disposed by way of on-site soakaways, with foul water drainage to the existing septic tank, which will be empty on a frequent basis. At the time of writing this report, Welsh Water Dwy Cymru are yet to respond, therefore, a further verbal report will be provided to members on any response subsequently received. Natural Resources Wales have advised that there is no objection to the proposal, subject to the applicant applying for a water quality exemption for the method of foul water sewage disposal or, if it is not possible to register an exemption, an environmental permit must be applied for. It also has provided a Planning Advice Note for the development.
Item 5c) Biodiversity

The application site is within an area where biodiversity is a known constraint. The Authority’s Planning Ecologist has been consulted and has advised that there are no comments for this application.

Other material considerations

- Supporting information on behalf of the applicants.

In the accompanying planning statement for this application, the case for the applicants is set out as follows:

“The proposed campsite will utilise existing, previously farmed poor quality land that has been redundant for productive agricultural purposes for some 10 years (when the farmhouse and 2.5 acres were split from the original farm holding). The applicant’s land holding amounts to only 2.5 acres and is considered far too small to provide a sustainable income from being farmed. The site layout, very small field sizes and topography of the land add further to its inability to ever become productive...Use of the land as a camping site will not, therefore, result in the loss of any high grade, productive farmland. There is no threat to the natural beauty, wildlife or cultural heritage of the Park as a result of this small scale development.

The applicants have already proved very quickly that their campsite can be a viable sustainable business in this location... As a viable business which contributes significantly to the local economy and which is the applicant sole means of income, this is precisely the type of development which is compatible with Policy 1 – National Park Purposes and Duty The economic benefits from this business contribute to fostering the overall economic and social well-being of the local community and have a significant financial input to the local economy.”

The following material factors, which were submitted as part of the applicants planning submission, need to be taken into consideration when processing this application:

- The business commenced operation in May 2013 and shut in September 2013;
- It re-opened in April 2014 and shut in September 2014;
- The average number of campers per day during the peak summer period (ie) school holidays was around 60 (ie 18/20 family groups);
- A further 50 campers per day during the peak period (or some 14/15 family groups) were turned away (resulting in business for other local campsites);
- An average of 2 touring caravans/camper vans per day used the site;
- To date, the applicants have invested some £315,000 of their own money in setting up the site and business;
- The average spend per visiting family per day is around £100, thereby resulting in something like £1,800 to £2,000 per day during the peak
period being spent within the local economy (around £60,000 per month).

The applicants have also referred to Chapters 7 and 11 of Planning Policy Wales Edition 7, which relates to Economic Development and Tourism, Sport and Recreation, and the South West Wales Regional Tourism Strategy. In response to these material considerations, the South West Wales Regional Tourism Strategy was originally produced by the South West Wales Tourism Partnership, which has now disbanded and therefore this document is no longer current. The “Pembrokeshire Destination Management Plan 2013-18” does include reference to the need to increase profitability and to attract more visitors, especially at times when there is capacity. To achieve this, the document lists a number of aims including protection of the environment; new products to attract new markets and keep pace with visitor expectations and protecting the environment – which is the reason that people come to the area. In support of creating a year-round visitor economy the Plan aims to improve the availability of good quality serviced accommodation; support continual upgrading of self-catering accommodation and upgrading of camping and caravanning accommodation. It does not seek to increase the number of accommodation providers. This supports the policy position of the LDP.

The applicant has also quoted Planning Policy Wales in the Design and Access Statement accompanying the application with particular relevance to the updated chapter on Economic Development (Chapter 7). Para 7.1.3 advises of the need to support economic and employment growth but alongside social and environmental considerations and within the context of sustainable development. However, there is no reference to giving greater weight to any of these elements. When considering businesses in the countryside the Guidance refers to sites being within or adjacent to defined settlement boundaries unless there are specific land requirements for that particular use. As camping and caravan sites are located in many areas, including inside settlements, a countryside location is not considered essential.

Conclusion

The proposal has been considered against the policies of the current Local Development Plan, and whilst the applicant has put forward reasons for the retention of the campsite in this particular instance, the main policy – 38 – Camping, Touring Caravans, Statics and Chalet Sites - which is relevant to this proposal and makes clear that no new camping sites would be supported. As a result, the material considerations put forward by the applicant do not outweigh the very clear policy position set out on Policy 38 of the Local Development Plan, regarding such developments. As such, the application cannot be supported by officers, and the recommendation is of refusal.
Recommendation

That the application be refused, for the following reason:

1. Policy 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan state that new camping, caravanning, static caravan or chalet sites will not be permitted in the National Park. The provision of the 24 pitch campsite and associated development is therefore contrary to adopted Development Plan Policy.
Proposed Site Plan

1:500

Item 5c)
Ex. Front (E) Elevation
1:100

Ex. Right (N) Elevation
1:100

Ex. Rear (W) Elevation
1:100

Ex. (S) Elevation
1:100
Prop. Front (E) Elevation
1:100

Prop. Right (N) Elevation
1:100

Ex. Section A-A
1:100
Visibility Splay Plan

1:500

Existing vehicle access to the site upgraded to achieve 70m visibility splay to the East and 120m visibility splay to the west to local authority requirements.

Existing access improved and utilised for proposed access.

Existing frontage of hedge part taken down to allow for improved access.

Existing car parking bays to existing dwelling retained.

Existing drive widened to be at least 5m wide, visibility splays as shown, and no growth/obstruction over 600mm.