Application Ref: NP/15/0401/FUL

Case Officer Applicant Agent Caroline Bowen Mr A Majcher

Proposal

Provision of 11 all weather serviced caravan pitches, widening of 59 existing all-weather caravan pitches, refurbishment of existing reception building within existing footprint, demolition & replacement of upper toilet block in exiting location, installation of portable

water storage tank and booster pumps

Site Location

Freshwater East Caravan Club Site, Freshwater East,

Pembroke, Pembrokeshire, SA71 5LJ

Grid Ref

SS01129809

Date Valid

14-Jul-2015

Target Date

07-Sep-2015

Summary

This planning application is brought before the Development Management Committee as the National Park Authority is the landowner of the site.

The application site is located to the south west outskirts of the main village of Freshwater East. The site falls outside of any Centre or Rural Centre, as defined for the Pembrokeshire Coast National Park Local Development Plan, and is, therefore in the countryside for policy purposes.

Full planning permission is sought for works within the existing caravan site to provide 11 all-weather serviced caravan pitches, to widen 59 all-weather caravan pitches, the refurbishment of the existing reception building, the installation of a portable water storage tank and booster pumps, and the demolition and replacement of the toilet block.

Following detailed consideration of the issues, and of the responses received from statutory consultees and the public, the proposed development is considered to be appropriate to the setting, and would be in accordance with national and local planning policy. The recommendation is, therefore, of approval.

Consultee Response

PCC - Ecologist: Objecting - We will require further information in relation to the potential presence of bats and suggest that a scoping and bat activity survey is undertaken to assess the likely impact.

Natural Resources Wales: Objecting - European Protected Species - Bats. We are in receipt of the 'Bat Survey and Mitigation Report' carried out by CSa Environemntal Planning dated August 2015. We note from section 5.7 'summary of proposed mitigation strategy' the recommendation for a third activity survey to be carried out, including, to clarify the bat use of the building, DNA results of the bat droppings already collected from the toilet block. The

survey and DNA results are necessary to better inform a specific mitigation strategy and until this information is received, we object to the proposed development.

Flood Risk.

Our latest Flood Map information, which is updated on a quarterly basis, suggests that the site partially falls within Flood Zone 2 which indicates that the site is considered to be at risk in events with at least a 0.1% chance of occuring in any one year. The main influence of flooding in this area is fluvial...

...we have no adverse comment to make regarding the proposed works to the upper toilet block, provision of a water booster tank including pumps and the refurbishment of the reception building as they all fall outside the recognised flood risk area... ...The widening of the existing pitches using a gravel construction will allow the surface water to drain through, thus not adding to the flood risk. Likewise, the installation of 11 all weather pitches replacing the existing grassed pitches will not add to the flood risk.

Waste.

If, during works, any contaminated material (including asbestos) is revealed then the movement of such material either on or off the site should be undertaken in consultation with Natural Resources Wales.

PCNPA - Park Direction: Provided that the proposed works are related to existing pitches and do not create additional pitches, the proposals are acceptable in principle.

PCC - Ecologist: Details of mitigation measures will be required prior to determination.

Lamphey Community Council: No objection

PCC - Transportation & Environment: No objection - This site has a good access off the County Road and the reception area is located well away from the junction. I have no objections on highway grounds to the plans as submitted.

PCNPA - Tree and Landscape Officer: Conditional Consent - There are no Tree Preservation Orders on or immediately adjacent to the proposed development site. The site is not within a Conservation area. No objection to the proposal subject to conditions relating to a scale Tree Protection Plan and proposed landscaping.

Public Response

The application has been advertised by means of site notice and by letters to neighbours immediately surrounding the site. No responses have been received.

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 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 40 - Site Facilities on Tent, Chalet and Caravan Sites

LDP Policy 53 - Impacts on traffic

PPW7 Chapter 03 - Making and Enforcing Planning Decisions

TAN 12 - Design

Constraints

Local Nature Reserve - within 25m
NPA Property - within 25m
Special Area of Conservation - within 500m
Technical Advice Note 15
LDP Mineral Safeguard
Biodiversity Issue
Potential for surface water flooding
Recreation Character Areas

Officer's Appraisal

The application site is an existing and long-standing caravan site, operated by the Caravan Club, which operate membership-only sites. The site extends along lower land beneath and to the western flank of Trewent Hill, and is screened within the wooded valley base. The site is accessed via the main road from the village leading to East Trewent.

The site is linear in layout, accessed initially by a single main road which then divides to serve two blocks of pitches, one on higher land above the other. The site has three permanent buildings which house a reception and shop, and two toilet blocks.

Planning History

- PR/794 The original planning permission for 120 pitches at this site.
- NP/06/610 Construction of 11 all-weather caravan pitches to replace 11 existing grass pitches. Approved.

Constraints

- Local Nature Reserve within 25m
- NPA Property
- Technical Advice Note 15 Development and Flood Risk
- LDP Mineral Safeguard
- Biodiversity
- Potential for Surface Water Flooding
- Recreation Character Areas

Current Proposal

The development comprises the following elements;

- To provide 11 all-weather serviced caravan pitches to replace 11
 existing grass pitches to the far west lower section of the site. The
 serviced pitches comprise a hardstanding of crushed stone chippings
 over a roadstone base, with an individual drainage point and either a
 shared water point bollard with two taps or an individual bollard with
 single tap.
- The widening of an existing 59 all-weather caravan pitches to the western half of the site from 6m by 9m to 9m by 9m.
- The refurbishment of the existing reception building which will involve the alteration of fenestration to the front elevation, and the installation of a new ramp access. The ramp will comprise a handrail on a small dwarf wall, extending 1.4m from the front of the building.
- To the east side of the reception building, a concrete slab measuring 4.5m by 3m will be laid to house a water tank and booster pumps to serve the site.
- The existing upper toilet block to the far west of the site will be demolished and a new toilet/shower block constructed, which will also accommodate disabled facilities, a store, a preparation area and a laundry. The dimensions of the new building, which will be built over the same footprint are 15.1 metres in width, 12.5 metres in depth and 5.1 metres in height to the apex of the roof ridge.

Key issues

The principle of the development.

The application site falls outside of any Centre or Rural Centre boundary, thus whilst the plan should be read as a whole, Policy 7 sets out specific land use priorities for development in the countryside. This includes tourist attractions and recreational activity where the need to locate in the countryside is essential. Policy 40 relates to site facilities on tent, chalet and caravan site, and permits development where 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.

In this instance, the proposal does not seek to increase the number of pitches, and the existing site facilities are to be improved. The new toilet/shower block would be confined within the curtilage of an existing development, would remain at the same height as the original, and whilst larger in footprint, is a simple plain building which relates appropriately to the site setting.

Siting

In respect of siting this would include both the site in the wider landscape setting, and the proposed site layout itself. Policy 8 – Special Qualities states that the priorities will be to ensure (amongst other criteria) that the pattern and diversity of the landscape is protected and enhanced (c).

The application site falls to the south west outskirts of Freshwater East, away from the main pattern of development, but screened by existing mature trees. The buildings are sited within the layout of pitches, thus are not read as individual structures in the landscape but as part of the site complex. The wider landscape setting would, therefore, not be adversely affected by the proposal.

Design

In the Local Development Plan, policies 15 and 29 seek to ensure that development does not have an adverse impact on the qualities and special character of the Park, and that proposals demonstrate an integrated approach to design and construction.

The improvement of the pitches relate to existing facilities, and are confined to the existing site layout. The works to the reception are mainly internal, but will result in alterations to the fenestration – the rearrangement of windows and doors/access is not considered to be visually intrusive.

The main part of the scheme involves the demolition of the upper toilet block (the furthest west on the site), and the provision of a new block with improved site facilities. The building will be larger in footprint, but remains the same height – the simplicity of the design is not harmful to the setting, and whilst the gable span is wider and flatter, this is considered more appropriate than increasing the height of the building, which would be more visually harmful.

Access and parking

Policies 52 and 53 relate to sustainable transport and the impacts of traffic. The site access and layout will be unaltered by the proposal.

The appropriate statutory consultee for Highway matters is Pembrokeshire County Council, and following consultation, they have recommended that there is no objection on highway grounds, as the site has good access off the County Road and the reception area is located well away from the junction.

Landscaping

There are no Tree Preservation Orders on or immediately adjacent to the proposed development site, and the site does not fall within a Conservation Area. The application was supported with tree data for the whole site. The Authority's Tree and Landscape Officer has been consulted on the proposal, and has recommended conditional consent, requiring details of the tree protection location whilst development is undertaken, and post-development landscaping. This can be adequately addressed by planning conditions.

Biodiversity

Policy 11 states that development that would disturb or otherwise harm protected species or their habitats will only be permitted where the effects will be acceptably minimized or mitigated through careful design, work scheduling or other measures.

The application was supported by a Protected Species survey, which identified that the roof void in the upper toilet block was used by bats. The Authority's Ecologist was consulted and advised that mitigation would be required that provides like for like roosting alternatives i.e. space in the new roof void comparable to existing. This would need to be shown on an amended plan, including details of dimensions, access points and materials.

A protected species license to disturb any bat roosts will be required from NRW before demolition can take place. Natural Resources Wales also advised that further information in respect of the proposal was required. The survey had recommended a further survey and DNA analysis of bat droppings to confirm the species using the building to better inform the mitigation. At the time of writing this report, the required information has been submitted, and forwarded to the Authority's Ecologist and NRW for comment.

Amenity – physical and visual

Policy 30 refers to amenity, and states that development will not be permitted where it has an unacceptable impact on amenity, particularly where the development is for a use inappropriate for where people live or visit (a), the development is of a scale incompatible with its surroundings (b), the development leads to an increase in traffic or

noise or odour or light which has a significant adverse impact (c), and/or the development is visually intrusive (d)

The proposed works are confined within the existing site curtilage, and are for a use which is compatible with the site. The majority of the works of improvement are to existing facilities, and can be carried out without significant impact in the wider landscape setting. The toilet block is enlarged to allow for the improvement of facilities – the siting remains the same, and the structure would relate appropriately to the existing site layout.

In respect of privacy, there are no immediate neighbours to the site, thus the development would not result in unacceptable overlooking, overshadowing or loss of privacy within private amenity spaces.

Surface water, drainage and contaminated land.

Policy 32 – Surface Water Drainage requires developments to incorporate sustainable drainage systems for the disposal of surface water on site.

Natural Resources Wales have advised that the site falls partially in Flood Zone 2, which is subject of fluvial flooding. Ordinarily, development would not be supported in this zone, however, in light of the fact that the site is already in existence, and has been for some time, there would be no objection. It was recommended, however, that should there be opportunity to relocate the pitches at risk of flooding, it would be advisable to do so.

Other material considerations

No other material consideration have been submitted, or identified for this proposal.

Conclusion.

Following detailed consideration of the planning issues identified during the consideration of the planning application; and of the responses received from statutory consultees and the public, the proposed development can be demonstrated as being appropriate to the site and setting in terms of siting, design, access, landscaping and external appearance; and would be in accordance with national and local planning policy. Subject to confirmation from NRW that the further information in respect of bats is satisfactory the recommendation is, therefore, of approval.

Recommendation

 The application be delegated to the Chief Executive (National Park Officer) / Director of Park Direction and Planning / Head of Development Management to grant planning permission subject to no further objections being received to the proposed bat mitigation measures, and subject conditions relating to time, accordance with plans, landscape conditions and ecological condition



