

Item 5 - Report on Planning Applications

Application Ref: NP/16/0181/S73

Case Officer	Kate Attrill		
Applicant	Dr T Hardman		
Agent	Mr D Middleton, Savills (UK) Ltd		
Proposal	Variation of Condition no. 5 of NP/10/141 to allow existing toilet block to be retained & used in conjunction with the caravan & camping site		
Site Location	Porthclais, Ffordd Porth Clais, St Davids, Haverfordwest, Pembrokeshire, SA62 6RR		
Grid Ref	SM74362423		
Date Valid	28-Apr-2016	Target Date	22-Jun-2016

Summary

The application to remove condition 5 of NP/10/0141 to allow for the continued use and retention of a toilet block building has been re-submitted following a Refusal at Planning Committee under planning reference NP/15/0365/S73.

The building in question is a small white rendered mono-pitched building currently used for toilet facilities with a timber fence/screen against its western elevation. The application differs from that submitted in 2015 as it now includes structural landscaping in the form of a long earth bund which has been suggested in light of the previous Planning Committee comments on the application in regard to landscape impacts.

The application has been considered in terms of visual impact on the special qualities of the National Park. Taking into account the public views, the backdrop to those views, and the character of the surrounding landscape, it is not considered that the retention of this building in combination with the suggested landscaping will have a negative impact on the special qualities of the National Park and the application is therefore recommended for approval.

Consultee Response

St Davids City Council: Supporting

PCC - Drainage Engineers: Reply

Public Response

The application was advertised in accordance with the requirements of the Town and Country Planning (Development Management Procedure)(Wales) Order 2012, with near neighbours notified by letter and a site notice erected at the end of the private drive facing onto the public road on the 17th May 2016.

One letter of representation was received from an occupant of a nearby property in regard to the proposal which listed three reasons for objection:

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1. Condition 5 of 10/141 was imposed to ensure a proper standard of appearance and to conserve the character of the area. The existing building is and has been determined by PCNPA to be unsightly and incongruous. The introduction of the proposed bund, which would be an alien structure in the landscape, would materially add to this incongruity.

2. The removal of Condition 5 would result in significantly more sanitary facilities (indeed an uncontrolled number) being available at the site. This of itself would inevitably result in an intensification of the use of the site. Intensification is strictly contrary to policy.

3. There is no consideration in the application of the impact of the substantially increased volume of effluent given that the site is not connected to the mains sewerage system.

Officer Response:

1. The structure proposed to be retained has been part of the local landscape for a significant number of years, although it has previously been considered to be incongruous within the landscape. However, the proposed bund will partially screen the complex of farm, domestic and camping buildings which form a cluster within the landscape. A Pembrokeshire hedge bank (which is proposed to be conditioned, albeit in different dimensions to those submitted will sit comfortably within the landscape and is not considered to form an alien feature). The provision of structural landscaping will resolve the incongruity previously described.

2. The applicant has claimed that the retention of these facilities are needed in accordance with licensing regulations given the number of campers authorised through the Certificate of Lawfulness (NP/14/0219). The retention of this building does not give or imply any consent for further intensification of the site beyond that certified. Policy 38 refers to increased pitch numbers, but this retention of an existing building does not presuppose any presumption in favour of further development of the site.

3. The drainage has been conditioned for assessment prior to the use of the two combined buildings, but would also be controlled through Building Regulations when the new building is brought into operational use. No details were submitted as part of the application and thus a condition to ensure there are no consequent environmental impacts is considered to be a reasonable requirement.

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

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LDP Policy 08 - Special Qualities
 LDP Policy 12 - Welsh Language
 LDP Policy 13 - Historic Landscapes Parks and Gardens
 LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
 LDP Policy 29 - Sustainable Design
 LDP Policy 30 - Amenity
 LDP Policy 39 - Upgrading Statics, Touring Sites and Tent Pitches
 LDP Policy 40 - Site Facilities on Tent, Chalet and Caravan Sites
 PPW8 Chapter 11 - Tourism, Sport and Recreation
 SPG06 - Landscape
 TAN 23 - Economic Development

Constraints

Special Area of Conservation - within 500m
 Special Protection Area - within 500m
 LDP Mineral Safeguard
 Historic Landscape
 Safeguarding Zone
 Rights of Way Inland - within 50m
 Hazardous Zones
 Nat Trust Covenants
 Recreation Character Areas

Officer's Appraisal

Site

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.

Planning Background

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 license. 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 granted subject to a condition that the existing toilet facilities, which were described as unsightly and incongruous, would be removed prior to the new facilities being brought into use. The applicant then constructed the new toilet block, without bringing it into operational use (the internals were not finished). The porta cabin facilities were removed, but the facilities that are the subject of this application were retained and remained in use.

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A certificate of lawfulness (reference NP/14/0219) was obtained for a certain number of campers (up to 200 over 4 fields). The applicant then sought a site license from Pembrokeshire County Council for the number of campers authorised by the certificate. The County Council, in granting the license said that if the existing facilities on site were to be demolished and the new facilities brought into use, then the facilities on site would be insufficient for the numbers of tents certified, and the number of tents would have to be reduced and new license conditions would be required. This explains the applicant's attempts to retain the existing facilities.

In reporting on the previous application to remove the condition requiring the current facilities (reference NP/15/0365/S73) to be demolished, officers did not accept that the site license established the need for permanent facilities to serve a greater number of tents as the peak periods which they were to serve were, on the applicants own evidence submitted in support of the certificate application, of a fluctuating, temporary and occasional nature and could be dealt with by the bringing on site of temporary facilities for periods not exceeding 28 days in any year. At that time officers saw this as the preferable solution to meet the need to provide hygienic and safe sanitary conditions at the site.

The applicant's proposal to provide structural landscaping is an alternative means of ameliorating any detrimental impact on the special qualities of the National Park. Officers are of the view that the landscaping not only mitigates the impact of views of the retained building in question but also provides a softening screen to other buildings in the vicinity thereby providing a general improvement in landscape terms.

Relevant Planning History

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

- NP/15/0365/S73 Removal of Condition 5 of NP/10/0141 – Refused by Planning Committee 11 November 2015.
- 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

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- 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

Description of Proposal

The application proposes the removal of Condition 5 of NP/10/0141 which required that before the new approved toilet block is brought into active use, that the previous block is demolished.

In light of comments made by Committee members during the November meeting, the applicant has re-applied but with the addition of a landscaping bund which, as shown in the application, measures 38.6 metres in length and follows a north-south alignment screening views to the west of the older and newer toilet blocks. The bund is proposed to be 2 metres in height, tapering to a one metre top..

Key Issues

The application raises the following planning matters:

- Siting, Design and Impact upon the Special Qualities of the National Park
- Residential Amenity and Historic Setting
- Landscaping

Siting, Design and Impact upon the Special Qualities of the National Park

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.

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').

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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 retention 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 Policy 29 and its reference to local distinctiveness, the applicant claims the building has been in place since the 1950's, and the historic OS maps do confirm that there has been a building in this location since the 1948/1953 revision. This is also relevant to Policy 40 and the impact on the character of the area.

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. The seasonal nature of camping means that there is an intense use as some times of the year. The permanency of the facilities for such fluctuating uses has been questioned in the past. However, this tourist accommodation site has the opportunity to provide permanent amenity facilities which can provide a better quality provision for the occupiers and also with structural landscaping can mitigate the visual harm of the permanent structure.

The most prominent public views of the campsite are from the coastal path immediately to the south and west of the site and from across Porthclais inlet to the west. A photo taken from a point on the coastal path just below Pen-Porthclais (the listed building to the south west) shows the toilet block on the left hand side of the farm complex against a background of other agricultural and domestic outbuildings. In terms of the backdrop, the toilet block is not prominently distinctive from the other surrounding buildings, and a bund will soften the long distance views of the farm and existing buildings from the coastal path.

It must be appreciated that there is no private "right to a view" from nearby residential properties. However there are public rights of way close to Pen-Porthclais – as above, the coastal path runs just below the property – and from closer to the property to the south and west. The views of the site are lesser from the coast path across Porthclais inlet than from Pen-Porthclais itself, due to the vertical alignment, but it is accepted that the planning system

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should consider the protection of an attractive view from a public viewpoint from being either lost or radically altered as a material planning consideration. In this instance, the proposed method of screening ameliorates the currently unattractive elements of the view from this location and it cannot be concluded that there will be an adverse impact.

The Tree and Landscape Officer has been consulted with regard to the proposals and does not consider that the bund (in an amended form and once grassed over) will form an alien feature within the landscape. It is not therefore considered that the proposal conflicts with either Policy 8, Policy 15 or Policy 40.

Residential Amenity and Historic Setting:

Given that the occupants of the nearest residential building have expressed a view on the application are residents of a Grade II Listed Building, it is considered appropriate to consider the two elements together.

In terms of residential amenity and Policy 30 requirements, there are no close neighbours whose residential amenity in terms of traffic, noise, odour or visual intrusion could be impacted on as a result of the proposals. The nearest residential property to the west is Pen-Porthclais, in excess of 2km across the Porthclais inlet, which has a view of much of the application site, but as set out above the proposal will not have a detrimental impact on that view.

The proximity of the Listed Building and the consequent impact of this proposal on its setting has been given consideration in accord with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires Authorities considering applications for planning permission for works that affect a listed building to have special regard to certain matters, including the desirability of preserving the setting of the listed building. The word "setting" is defined in CADW's guidance document 'Conservation Principles' (2011) as: "the surroundings in which an historic asset is experienced, its local context, embracing present and past relationships to the adjacent landscape".

Bearing in mind the distance between the listed building and the proposal, and that the prime views of the Listed Building and its setting are from the north and east and the proposed method of screening proposed in the application, the setting of the listed building is not considered to be adversely impacted.

Landscaping:

The site lies within the St Davids Head Landscape Character Area (as defined within the Assessment SPG June 2011).

St Davids Head Landscape Area:

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This large Aspect Area on the St.David's headland is comprised of a typical west Pembrokeshire landscape, featuring gently undulating farmland with an open character. Higher ground affords views within this Aspect Area as well as accessible 'borrowed views' to the coast and Ramsey Island, the distinctive Carn Llidi hills to the north and to buildings within the city of St David's - including the Cathedral - which all add to the sense of place. The coast is characterised by a series of tall indented cliffs and steep slopes, small scale rocky headlands and inlets with sandy beaches.

Discernible Landscape Trends

- The area appears to be in a constant state of mixed agricultural land use of both arable and livestock farming*
- Some of the farm units have recent agricultural buildings which are incongruous with this landscape and the traditional vernacular farm buildings.*

Management Guidance

- Any proposed caravan parks - or extensions to existing sites - to be located so as to minimise visual impact within the landscape and respect the historical significance of this area; mitigate existing visual impacts*

It should be appreciated that this is not an extension of the existing campsite. The bund which has been suggested to screen the views of the toilet block have been proposed at the suggestion of Committee members who expressed concerns during consideration of NP/15/0365/S73 at the November 2015 Planning Committee and will also comply with the management guidance specified in the Landscape Assessment SPG.

The Planning Authority's Tree and Landscape Officer has been consulted and has responded as follows:

It would appear that amendment to the landscaping proposal is required. The proposed bund is out of scale for a typical Pembrokeshire Hedgebank and it would be advised that the dimensions are amended in order to successfully assimilate the feature into the adjacent landscape.

Appendix B of this response includes plans showing typical dimensions for Pembrokeshire Hedgebanks.

The proposed feature will not require stone facing; however the dimensions are the key issue to ensure the structure suits the landscape. It would be necessary to implement planting on the bank; however St David's peninsula typically does not have continuous species cover along hedgebanks and as such small clusters of planting would be appropriate. Clustered groups of native species such as Elder and Gorse; planted sporadically along the bank would help to offer a broken screen, whilst maintaining the aesthetic of the area.

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In accordance with these recommendations, a specific condition to ensure the bund complies with local landscape character, has been recommended.

Conclusion

The building which contains the existing toilets is situated adjacent to the new toilet block within an agricultural barn. The proposed structural landscaping will aid in softening the long distance views of the cluster of existing buildings to the benefit of the wider landscape.

On balance it is considered that, given the softening of the long distance views of both these facilities and the rest of the farm and existing buildings by the bund there are no unacceptable impacts on the special qualities of the National Park.

It is also pertinent that, given the conclusion that, with the incorporation of the bund, there are no impacts on the special qualities of the National Park, it would not be proper for the Authority to refuse this application on the basis that it would result in a reduction in the number of campers at the site. The number of campers on the site is already established via the certificate process, which is conclusive. The Authority must focus on whether there are detrimental impacts on the special qualities of the National Park resulting from the application.

The consideration of the potential for the building to have an impact on the setting of Penporthclais (the nearest Listed Building), at over 2km away, has also been judged to be of no detrimental impact taking into account the proposed landscaping. It is the setting of the Listed Building, rather than views from the Listed Building which are crucial in the determination of assessing impact. Given the situation of the Listed Building above the level of the coastal path, and the predominant views of that building being from the north and east, rather than from the adjacent coastal path, the setting is not considered to be adversely affected by this proposal.

As such, the application is recommended for approval subject to conditions.

1. No development shall commence until details of a scheme for the disposal of foul and grey water for the combined toilet buildings has been submitted to and agreed in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details prior to the use of both toilets block in conjunction and retained in perpetuity.

Reason: To ensure that effective drainage facilities are provided for the proposed development and that no adverse impact occurs to the environment or the existing sewerage system. Policy: Local Development Plan – Policies 29 (Sustainable Design) and 32 (Surface Water Drainage).

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2. No development shall take place until details of the sourcing of the material for the landscaped bund, and a scheme for both hard and soft landscape works have been submitted to and approved in writing by the local planning authority.

Details shall include location and construction method of the proposed bund feature showing dimensions and details of planting along the hedgebank.

Soft landscape works shall include schedule of plants noting species, plant supply sizes and proposed numbers/densities where appropriate; and implementation programme (including phasing of works where relevant).

Reason: In the interest of protecting visual amenity and the special qualities of the area. Policy: Local Development Plan - Policy: 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity).

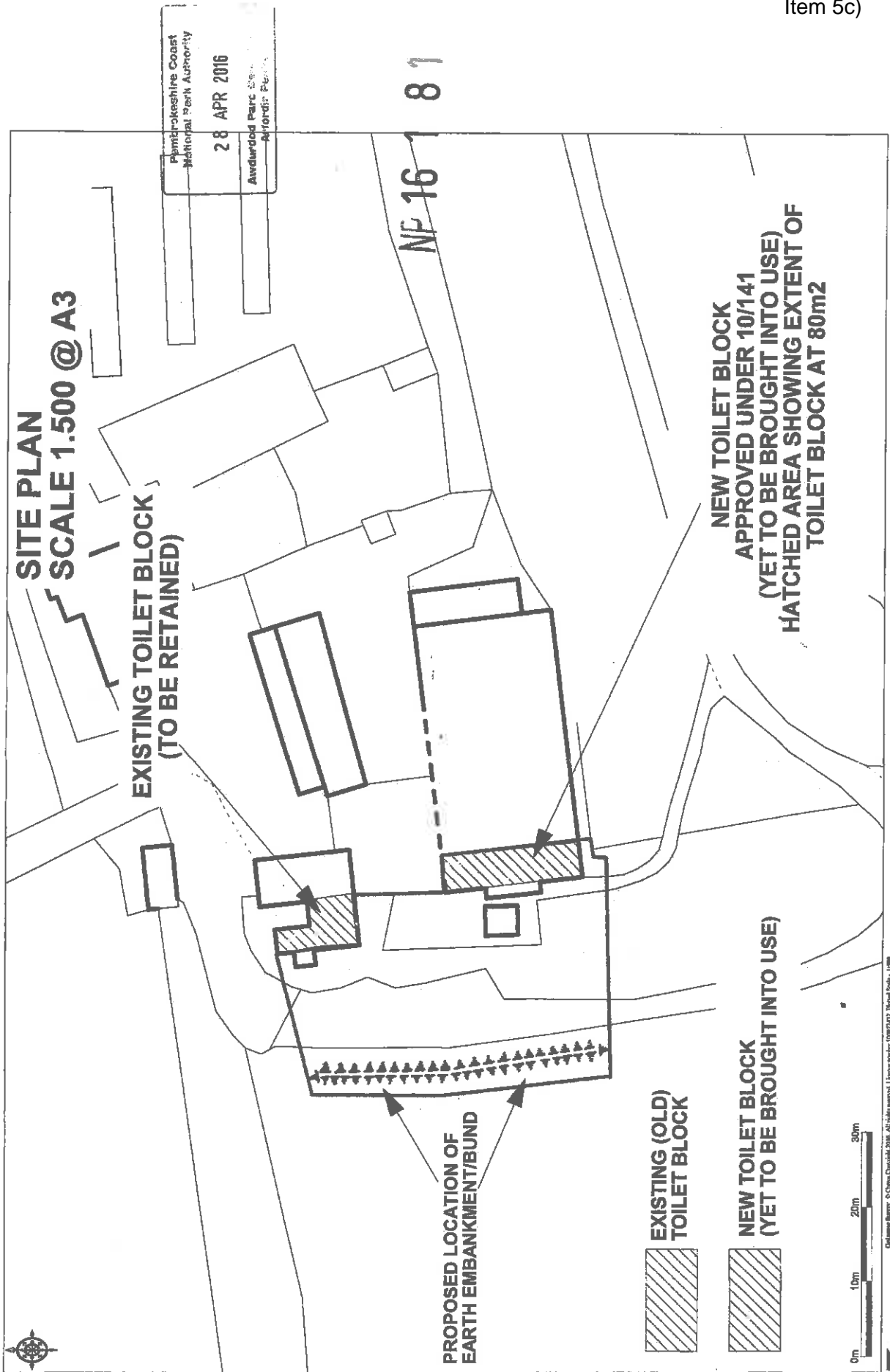
3. The development shall be carried out in accordance with the following approved plans and documents:

Site Plan 1:500 received 28th April 2016

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

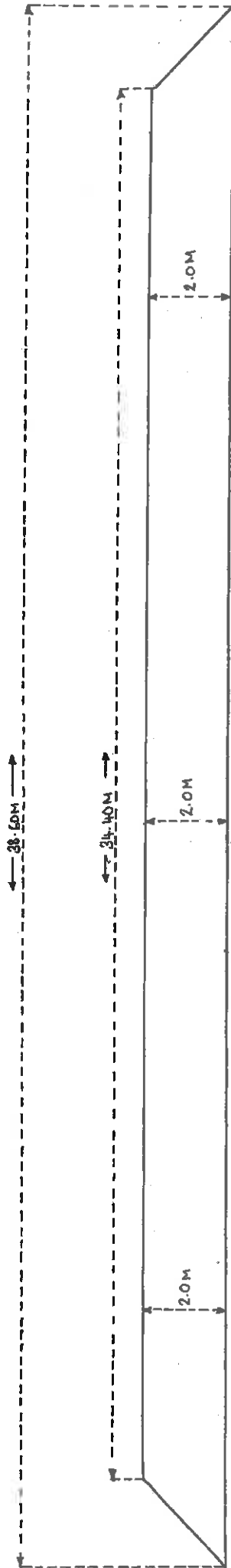
INFORMATIVE:

The conditions on this planning application are in addition to those imposed on NP/10/0141 and in response to the removal of Condition 5. Any other conditions remain unaltered.



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

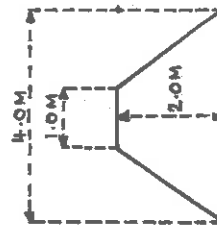
**1:100 SCALE
EARTH BUND CROSS-SECTION DETAIL**



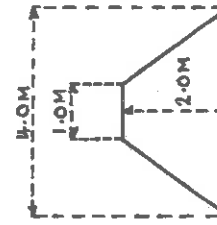
LONGITUDINAL SECTION

Pembrokeshire Coast
National Park Authority
28 APR 2016
Awdurdod Parc Cwm
Arfordir Porthclais

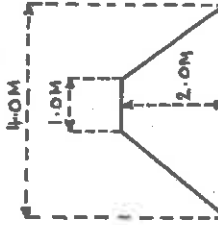
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VIEW FACING SOUTH



CENTRAL CROSS-SECTION (A-A)

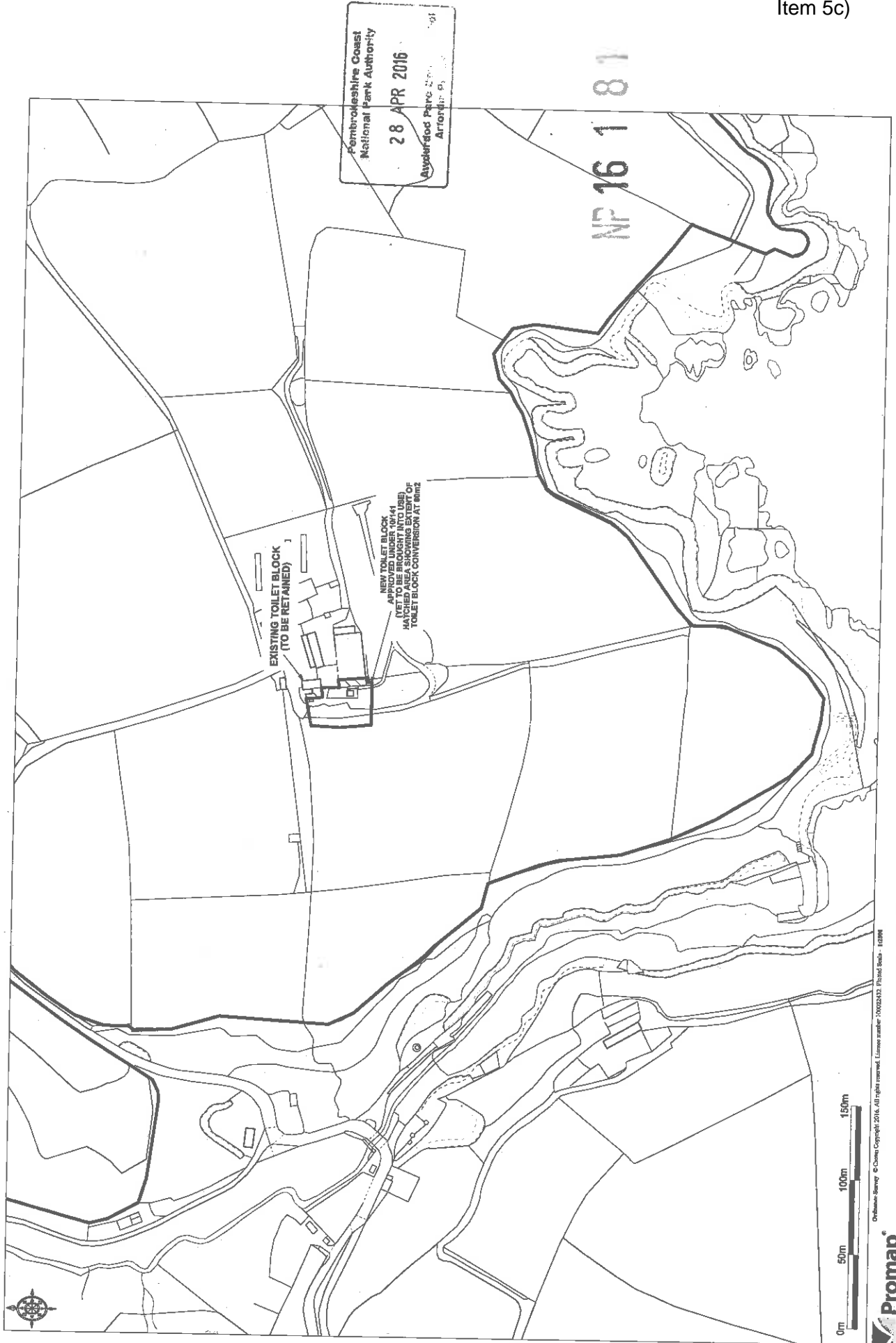


VIEW FACING NORTH

Item 5c)

**PORTHCLAIS CARAVAN AND CAMPING PARK
PORTHCLAIS FARM, ST. DAVIDS, SA62 6RR**

1:2500 LOCATION PLAN
APPLICATION SITE WITH LAND OWNERSHIP



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

savills

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