Application Ref: NP/16/0685/FUL

Case Officer: Andrew Richards
Applicant: Mr D Flight
Agent: Mr D Middleton, Savills (UK) Ltd
Proposal: Siting of 46 static caravans in lieu of 60 touring caravan pitches & retention of 20 touring caravan pitches/glamping pitches together with environmental improvements
Site Location: Redlands, Hasguard Cross, Haverfordwest, Pembrokeshire, SA62 3SJ
Grid Ref: SM85201093
Date Valid: 10-Feb-2017
Target Date: 17-May-2017

Consultee Response

The Havens Community Council: Supporting
PCNPA - Park Direction: Supporting in principle
PCNPA - Ecologist: Conditional Consent
PCC - Transportation & Environment: Conditional Consent
PCNPA - Tree and Landscape Officer: Conditional Consent

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Correspondence has been received via the Community Council from the neighbour at Hasguard Cross Caravan Park and raises the following issues:

- The existing neighbouring site has static pitches that are available, therefore is there a need for this proposed change?

The principle of the proposed development is addressed in the Officers Appraisal section of this report.

Policies considered

Please note that these policies can be viewed on the Policies page of 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 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 31 - Minimising Waste
LDP Policy 32 - Surface Water Drainage
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LDP Policy 35 - Visitor Economy
LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 03 - Making and Enforcing Planning Decisions
PPW9 Chapter 04 - Planning for Sustainability
PPW9 Chapter 07 - Economic Development
PPW9 Chapter 08 - Transport
PPW9 Chapter 11 - Tourism, Sport and Recreation
PPW9 Chapter 13 - Minimising and Managing Environmental Risks and Pollution
SPG05 - Sustainable Design
SPG06 - Landscape
SPG11 - Coal Works - Instability
SPG12 - Parking
SPG23 - Enabling Sustainable Development in Welsh NPAs
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 13 - Tourism
TAN 15 - Development and Flood Risk
TAN 18 - Transport
TAN 23 - Economic Development

Constraints
Safeguarding Zone
Hazardous Zones
Recreation Character Areas
Low Coal Risk
Landscape Character Assessment
Seascape Character Assessment

Officer's Appraisal

Background and History

The site currently has permission (and licensing) for 60 static pitches and 20 tent pitches, and is situated alongside the Haverfordwest to Dale road and adjacent to two further caravan sites. The Redlands site is located on land which rises and approaching from the east is on the skyline. The rows of trees within the site are distinctive and can be discerned from various points in the general area of the National Park, including some distance views.

- NP/428/97 – Dwelling & barn – Approved 08.07.1998
- NP/08/050 – Dwelling & vehicle store – Approved 08.07.1998
- NP/02/245 – Use existing reception room as reception/retail shop for campers – Approved 08.07.2002
- NP/06/355 – Form bed/games roof & bathroom over existing garage – Approved 01.09.2006

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• NP/12/0339 – Certificate of lawfulness for use of land for siting of up to 19 tented camping pitches between the period 1st March to 31st October in any one year – Granted 16.08.2012
• NP/15/0040/S73 - Removal of Condition no. 5 (No pitch to be occupied for more than 14 days by any individual caravan) of planning permission HR/9706 – Approved 23.03.2015

Current Proposal

Planning approval is sought for the siting of 46 static caravans in lieu of 60 touring caravan pitches together with an area retained for 20 touring caravan pitches / glamping pitches and overall environmental improvements to the existing caravan site.

Key Issues

The application raises the following planning matters:-
• Policy and Principle of Development
• Visual Amenity and Special Qualities of the National Park
• Siting and Sustainable Design
• Amenity and Privacy
• Highway Safety and Access
• Landscaping
• Land Stability
• Biodiversity

Policy and Principle of Development:
Policy 38 of the Local Development Plan seeks to retain the status quo in terms of caravan and camping pitches in the National Park. The policy is not explicit about not allowing changes from touring pitches to static pitches and as noted by the applicant, on several occasions the Authority has permitted such changes within existing sites. These have generally resulted in a reduction of pitches and not permitted an extension of the site area whilst also providing environmental improvements to the overall site.

The current application seeks a reduction in the number of overall pitches by 14, no increase in the site area and also proposes environmental improvements which would provide mitigation for the proposed change from touring caravans to static caravans. The plans showing the existing layout of the site also show an area identified for 20 touring caravan/tented pitches/glamping pitches.

The glamping structures should meet the definition of a ‘caravan’ else they would not be authorised by any permission granted, in order to ensure this is the case a condition will be attached to any permission granted together with an indication of maximum numbers of pitches within the site and that the glamping units meet the definition of a caravan. As such, officers consider that the principle of the proposed development is acceptable, and that the application could be supported through policy 38 in this instance.

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Visual Amenity and Special Qualities of the National Park:
In considering such applications the impact of the proposal on the National Park landscape is a key consideration and therefore Policies 8 and 15 are particularly relevant. Policy 15 aims to control development causing a significant visual intrusion. In addition to these policies the Authority has adopted a Landscape Character Assessment (LCA) Supplementary Planning Guidance (SPG) of which the current site straddles the boundaries of LCA 9 (Marloes Peninsula) and LCA 12 (St Brides Bay).

The LCA’s recognise that this agricultural landscape overlies a gently undulating landform on the coastal hinterland of this area on the west coast of Pembrokeshire. The landscape contains small wooded valleys and some overgrown hedges and areas of scrub. It has scattered small villages and farmsteads, some with tourism developments including caravan parks.

The coastline is dominated by cliffs with extensive rocky and sandy shores with lowland mixed deciduous woodland developed in sheltered coastal valleys. Views of the site from within these areas are dominated by the existing twenty eight non-native conifer trees which are scattered around the boundary and in two long rows within the site. The scale of these existing trees punctuates the skyline and can be easily seen from as far as St Davids.

The LCA’s management guidance indicates that tourism developments – particularly extensions to caravan parks – should be sited and designed to avoid adverse landscape and visual impacts. It also indicates the need to preserve the woodland within the landscape through small scale thinning and felling to ensure a mixed age and diversity of native tree species.

Therefore, the removal of these trees (which are considered to be incongruous features within the landscape) is supported by officers subject to their replacement with a new appropriate native landscaping scheme to the boundaries and within the site in general. This would also be considered to provide a good level of environmental improvement to the site overall.

The current proposal also reduces the number of pitches by 14, and this in turn assists to reduce the density of the development within the site and when viewed from the wider landscape. The proposed caravans are located within the site around a new site access road with individual parking spaces for each pitch.

The existing neighbouring site with static caravans are highly visible from the north, as are views into the application site and the cumulative impact of the spread of caravans to the east needs to be carefully considered. It is noted that the applicant has suggested that visual impact can be mitigated by growing the existing hedgerows to 3m, the removal of the existing non-native planting and its replacement with new native planting throughout the site and also the use of environmentally coloured static caravans.

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It is considered that the above elements would be sufficient in this instance to reduce any visual impact to acceptable levels when viewed from the immediate and wider landscape. The removal of the non-native landscaping given its scale and visibility in the wider landscape is considered to be an improvement on the visual amenity of the area as a whole. As such, the proposal would also be acceptable in term of its impact on the special qualities of this area.

*Siting and Sustainable Design:*
The siting of the new pitches is considered to be acceptable given their siting on brown field land within the existing site. The design of the pitches and the scale of the caravan units follow a standard approach to pitch unit design within the National Park and the materials used will also follow the standard approach within the site. No details of the proposed levels for the new static caravan pitches have been provided, and this information will need to be agreed through planning conditions imposed on any consent granted.

*Amenity and Privacy:*
Policy 30 of the LDP states that development will not be permitted where it has an unacceptable impact on amenity. Given the scale, type of proposal and location, it is considered that there will be no greater adverse impact on neighbours amenity or privacy.

*Highway Safety and Access:*
The current proposal maintains the existing pedestrian and vehicular access and also the parking and turning areas within the site. The proposed works provide a reduction in peak traffic as a result of the changes, even though the season is likely to be over an extended time there will be fewer movements of caravans using the entrance.

Pembrokeshire County Council Transportation and Environment section do raise a concern about visibility when leaving the site and looking east. Currently there is an existing sign and support which is within the visibility splay and the highways officer has requested that all signs and supports be lowered within the visibility splays. As such, a planning condition will be imposed to control this aspect.

*Landscaping:*
The existing site currently benefits from mature hedge screening to three of the four boundaries. A landscape character assessment was carried out by officers and is detailed above and considers that these existing trees are an incongruous feature within the landscape in their current form. As such the agent has been informed that officers would be seeking their removal and a replacement native landscaping scheme.

An amended landscaping drawing has now been submitted which details the removal these trees and their replacement with 29 native trees with a mix of sessile oak, silver birch, rowan, wild cherry and crab apple. These new trees are to be located on the boundaries and within the site to assist in breaking up views of the proposed caravans from the adjacent landscape. A new

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Pembrokeshire hedgebank is also proposed along the eastern boundary to form an enclosure along this boundary and also assist with screening, the hedgebank will also incorporate a mix of hawthorn, hazel, blackthorn, dogwood and guelder rose to complement the existing hedgebanks on the other boundaries.

The proposed changes to the landscaping scheme are considered to address the concerns raised, and also assist the proposal in creating overall environmental improvements to the site whilst also following the LCA management guidance for this area. Planning conditions would need to be imposed to ensure that the proposed landscaping is implemented within the first planting season and retained as approved.

Land Stability:
The site is located within an area defined by The Coal Authority as containing potential hazards arising from coal mining. With regard to the current application type the applicant is not required to provide a Coal Mining Risk assessment as land instability from former coal workings will be considered under the building regulations process. In this respect an informative will be added to any consent issued to inform the applicant of this.

Biodiversity:
PPW, TAN5 and LDP policy 11 requires biodiversity and landscape considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.

The Ecologist has commented on the application stating that a protected species survey is not required as there is low likelihood of protected species being found at the development site, or that there would be any adverse impact on the habitat or species as a result of the development. However, any proposed external lighting may have an impact and a condition would be imposed to control the type and location of any proposed external lighting. As such, the proposal conforms with the relevant requirements of PPW, TAN5 and LDP policy 11.

Conclusion

Following consideration of the policies contained within the Local Development Plan and National Planning Policy in the form of Planning Policy Wales (Edition 9, November 2016) and having regard to all material considerations it is considered that the development offers an opportunity to retain and enhance an existing caravan site through the above stated environmental improvements. The development will be in keeping with the aims of the LDP in that the development will conserve and enhance the existing character of the area. As such, and subject to a schedule of suitable conditions to control the development, the development is considered to be acceptable and complies with the requirements of policies 1, 7, 8, 15, 29, 30, 31, 32, 35, 38 and 53 of the Local Development Plan.

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Recommendation

The recommendation is for the application to be approved subject to the following conditions:

1. The development shall begin not later than five years from the date of this decision.
   **Reason:** Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:
   - Location Plan (Received 19.12.2016)
   - 1481.01 (Received 19.12.2016)
   - 1481.02/A (Received 19.04.2017)
   - 1481.03 (Received 19.12.2016)
   - 1481.04/A (Received 19.04.2017)
   - 1481.05/A (Received 19.04.2017)
   - Design and Access Statement (Received 19.04.2017)
   - Pre-Application Consultation Statement (Received 10.02.2017)
   **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).

3. Before development commences details of external illumination within the site, including measures to control light spillage, shall be submitted to the National Park Authority for approval, in writing. Development shall be carried out and maintained in accordance with the approved details.
   **Reason:** To ensure that animal and plant species which within the terms of the Conservation (Habitats 2c) Regulations 1994 are effectively protected and the Local Development Plan – Policy 11 - Protection of Biodiversity.

4. No development shall commence until details of existing ground levels and proposed finished ground for the new static caravan pitches have been submitted to, and approved, in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
   **Reason:** In order to be clear on the levels of the development approved to provide for a proper standard of development and appearance in the interests of conserving the amenities and special qualities of the area. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park), 29

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(Sustainable Design) and 30 (Amenity).

5. No development shall take place until a complete schedule of colours and roof types to be applied to the proposed static caravan units has been submitted to, and agreed in writing, by the Local Planning Authority. The static caravans shall be installed only in accordance with the approved colour scheme and roof type details, in the locations as set out on the approved drawings, and be retained in accordance with these details.

**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).

6. The landscaping works shall be carried out in accordance with the approved details on drawing reference: 1481.05 (Received 03.04.2017).

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

7. All planting, seeding and turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the commencement of development, whichever is the sooner; and any trees or plants which, within a period of five years from the completion of the development, fail, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority give written consent to any variation.

**Reason:** In the interests of maintaining a satisfactory scheme of landscaping and to protect the visual amenity of the area. Policy: Local Development Plan - Policy 15 - Conservation of the Pembrokeshire Coast National Park.

8. Before work commences on any part of the approved development, all signs, along with any supporting walls, shall be lowered to no higher than 900mm within the visibility sight lines for the access onto B4327, and maintained as such for the future.

**Reason:** In the interests of road safety. Policy: Local Development Plan Policy 53 - Impacts of Traffic.

9. The caravan site shall be occupied as holiday accommodation only and shall not be occupied as a person's sole or main place of residence. An up to date register shall be kept at the site office and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all of the occupiers of the caravan

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pitches, their main home addresses and their date of arrival and departure from the caravan site.

**Reason:** In order to ensure that the accommodation is occupied solely for holiday letting purposes only and not for any other residential purpose. Policy: Local Development Plan – Policy 37 (Self Catering Development).

10. This permission grants consent for the provision of 48 static caravans within the main area, and 20 touring caravan/glamping pitches in the area retained for touring caravan/glamping pitches as indicated on drawing reference: 1481.02. The approved glamping structures shall meet the definition of a caravan.

**Reason:** In order to clarify the extent of the planning permission having regard to the application details submitted and in the interests of visual amenity and the special qualities of the National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

**Informatives**

This consent does not give permission for any ramped access or verandas. Separate planning consent will be required for such structures.

**DEVELOPMENT LOW RISK AREA - STANDING ADVICE**
The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to The Coal Authority on 0845 762 6848.

Further information is also available on The Coal Authority website at www.coal.decc.gov.uk

Property specific summary information on past, current and future coal mining activity can be obtained from The Coal Authority's Property Search Service on 0845 762 6848 or at www.groundstability.com
LOCATION PLAN
1:2500 @ A4

REDLANDS CARAVAN PARK,
HASGUARD CROSS, HAVERFORDWEST,
PEMBROKESHIRE SA62 3SJ
Item 5e)