Application Ref: NP/16/0555/FUL

Case Officer Andrew Richards
Applicant Mrs L Parkes
Agent Mr A Vaughan-Harries, Hayston Development & Planning
Proposal Change of use of land and siting of shepherds hut for seasonal holiday accommodation together with associated washroom and boardwalk (Partly retrospective)
Site Location Land to the rear of Isfryn, Pontyglasier, Crymych, Pembrokeshire, SA41 3SA
Grid Ref SN13943845
Date Valid 01-Nov-2016 Target Date 15-Feb-2017

The application was previously reported to the Development Management Committee on 14th December 2016. No decision was reached at the meeting following a tied vote on the recommendation to refuse and it was decided that the application would be referred to the next available Committee meeting for further discussion. During the debate on the application it was indicated that in the event of a decision to grant permission contrary to the recommendation it would be made subject to a “cooling-off” period due to the proposal being considered a significant departure from adopted LDP policy. A motion to amend the recommendation to grant permission failed. The application is now reported again for members to determine.

Consultee Response

PCNPA Park Direction: The proposal is contrary to adopted Local Development Plan Policy
Eglwyswrw Community Council: No response received
Natural Resources Wales: No objection
PCNPA Tree and Landscape Officer: No objection and advisory note
PCNPA Access Manager: No objection
PCC Transportation and Environment: No objection
PCC Pollution Control: No objection
PCC Drainage Engineers: No objection
PCC Planning Ecologist: Conditional consent
Dwr Cymru Welsh Water: No objection

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. 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 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 31 - Minimising Waste
LDP Policy 32 - Surface Water Drainage
LDP Policy 34 - Flooding and Coastal Inundation
LDP Policy 35 - Visitor Economy
LDP Policy 37 - Self-Catering Development
LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites
LDP Policy 53 - Impacts on traffic
PPW8 Chapter 03 - Making and Enforcing Planning Decisions
PPW8 Chapter 04 - Planning for Sustainability
PPW8 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW8 Chapter 07 - Economic Development
PPW8 Chapter 08 - Transport
PPW8 Chapter 11 - Tourism, Sport and Recreation
PPW8 Chapter 12 - Infrastructure and Services
PPW8 Chapter 13 - Minimising and Managing Environmental Risks and Pollution
SPG05 - Sustainable Design
SPG06 - Landscape
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

Pembrokeshire Coast National Park Authority
Development Management Committee – 8th February 2017
Constraints

Technical Advice Note 15
LDP Mineral Safeguard
Safeguarding Zone
Rights of Way Inland - within 50m
Hazardous Zones
Potential for surface water flooding
Recreation Character Areas
Landscape Character Assessment

Officer’s Appraisal

Background and History

The application site forms part of the existing residential property known as Isfryn, and also a paddock to the rear of the property. The site is located at Pontyglasier which is a small cluster of dwellings centred on a river crossing and includes a chapel. The host property Isfryn lies to the north of Penddol and the C class road which runs through Pontyglasier from Crymych and Crosswell.

Isfryn is a large detached dwelling set within spacious grounds in a wooded valley. The dwelling has a large gravelled area to the rear which provides parking and also accommodates a stable structure.

Further beyond the residential curtilage is a grassed paddock area leading onto the existing unauthorised shepherds hut, wash room and boardwalk which is currently located in proximity to the stream. This site is within the C2 flood zone, hence the requirement for relocation.

The proposed site is located further into the countryside to the west; some 40 metres away from the existing siting, 130 metres northwest of the host property and located within a field which is elevated several metres in relation to the existing siting of the structures.

The following previous applications have been identified for the site:
  - NP/06/162 – Replace porch – Approved 30.05.2006
  - NP/06/615 – Alterations and extensions – Approved 17.04.2007

Current Proposal

Planning approval is sought for the change of use of agricultural land to site a shepherds hut for seasonal holiday accommodation together with associated washroom and boardwalk (Partly retrospective). The shepherd’s hut and associated washroom and boardwalk are currently located on a lower section of land adjacent to the stream which runs alongside the property.

Pembrokeshire Coast National Park Authority
Development Management Committee – 8th February 2017
It is noted that these works have been completed since June 2015 but do not have planning consent. The current proposal seeks to retain the structures but relocate them to the new elevated site to the west.

**Key Issues**

The application raises the following planning matters:-
- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Highway Safety and Access
- Landscaping
- Biodiversity
- Land Drainage, Waste and Flooding
- Other Material Considerations

**Policy and Principle of Development:**

The proposal seeks approval for a new holiday let use in an open countryside location. The proposal lies outside the existing residential curtilage of Isfryn. In order to establish whether the principle of the above proposed development is acceptable, the following LDP policies are relevant:

- Policy 35 – Visitor Economy
- Policy 38 – Camping, Touring Caravans, Statics and Chalet Sites

The proposed shepherds hut is considered to fall under the statutory definition of a caravan for planning purposes as a structure designed or adapted for human habitation which is capable of being moved from one place to another. The associated structures do not fall under this classification and would require planning permission in their own right.

Adopted LDP policies 35 and 38 state that additional camping, caravanning or chalet pitches will not be permitted, but change over to other forms of self-catering for existing sites within centres, will be permitted. The policy is specific in limiting self-catering accommodation on brownfield sites within Centres or through the conversion of appropriate buildings in the countryside.

The current proposal is therefore considered to conflict in principle with the above adopted LDP policies.

The submitted application refers to statements within national policy that support the provision of tourism related development within rural areas and businesses within the rural economy.

However, the particular use proposed is one which, in the local context of the Pembrokeshire Coast National Park, is not considered appropriate under adopted local planning policy. The LDP provides flexibility for updating existing sites within

Pembrokeshire Coast National Park Authority
Development Management Committee – 8th February 2017
the centres to adapt to new trends in tourist accommodation demand. It also allows for other forms of tourist related development in appropriate locations within the centres or where a countryside location is considered essential. The LDP does not allow for additional caravanning pitches as proposed in this application.

Small tourism accommodation ventures can also benefit from permitted development rights becoming “Certificated sites” through various recognised caravanning and camping organisations.

It is also material to mention that adopted LDP policy 38 refers in paragraph 4.168 by way of justification of the policy to the fact that the majority of caravan and camping sites in the County are concentrated in the National Park, which occupies only 37% of the total land area of the County.

Accordingly, the proposal is contrary to policy 38 of the adopted Local Development Plan, and cannot be supported, unless there were very strong material considerations that outweighed the conflict with LDP policies 35 and 38.

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

The site is located within the National Park and also close to the boundary to the Landscape Character Assessment Area 27 – Mynydd Preseli.

Policy 8 of the adopted LDP refers to the National Park’s commitment to preserving and wherever possible enhancing the special qualities of the Pembrokeshire Coast National Park. Policy 15 sets out that development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

a) causing significant visual intrusion; and/or,
b) being insensitively and unsympathetically sited within the landscape; and/or
c) introducing or intensifying a use which is incompatible with its location; and/or
d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or
e) losing or failing to incorporate important traditional features.

Whilst there is little visual intrusion to the wider landscape from the proposed development the proposal would result in the extension of the built form extending into the surrounding countryside to the rear of the residential dwelling which would result in the development being insensitively and unsympathetically sited within the landscape, which also fails to harmonise with or enhance the landform and landscape character of the National Park.

Amenity and Privacy:

The existing and proposed sites are located approximately 120metres and 130metres respectively from the rear of the host dwelling and approximately

Pembrokeshire Coast National Park Authority
Development Management Committee – 8th February 2017
170metes away from the nearest neighbouring property at Dolgoed. Based on the nature of the proposal and the respective distances away from existing development it is not considered that in this instance the proposal will have an adverse impact on the amenity and privacy of surrounding properties.

**Highway Safety and Access:**

Access to the site is via the adjacent C class road and shares the main access into Isfryn, with the proposal incorporating a shared parking area to the rear of the residential curtilage. The holiday accommodation pedestrian access leads onto a winding gravel track from the parking area to the existing site located immediately adjacent to the stream. The current proposal seeks to extend this path into the adjacent field to serve the new location. The winding path passes through a tree lined paddock and onto a raised board walk which provides access directly into the shepherds’ hut and associated washroom.

The proposal is not considered to affect the nearby inland right of way. Pembrokehire County Council Transportation and Environment section considers that the existing access and parking areas are suitable to support the holiday let. As such, no objections are raised in relation to highway safety or access.

**Landscaping:**

The proposed site is flanked on two sides by mature landscaped hedgebanks to the south and west. The relocation of the structures will include an extension to the access path but also the mains water supply and electricity which extends from Isfryn and the associated stable block up to the site. The extended footpath, services and landscaping will need to be carefully considered in relation to any excavations in close proximity to trees and also Himalayan Balsam which is present within the immediate area.

Further information has now been submitted which indicates appropriate information relating to the footpath implementation method, location/route of the mains electricity and also the specific details of proposed native planting. These details are considered to be acceptable and can be supported subject to an informative note added to any permission granted indicating that the proposed Bird Cherry species whilst acceptable may be changed to Wild Cherry which is native to Pembrokehire.

**Biodiversity:**

PPW, TAN5 and adopted 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 proposal will include external lighting and the application indicates that such lighting will directed away from field boundaries and vegetation and use low level, low wattage lighting. No details of the proposed lighting have been provided with the Pembrokehire Coast National Park Authority Development Management Committee – 8th February 2017 Page : 24
application but drawing 6 indicate location of lighting related to the extend footpath and new siting of the structures.

An ecological walkover and appraisal report has been submitted in support of the application and the planning ecologist has been consulted and does not raised objections to the current proposal subject to the works being carried out in accordance to the recommendations indicated within the submitted ecological report.

Land Drainage, Waste and Flooding:

The application states that a compost toilet is currently provided and any waste arising from this is spread around trees on the small holding as and when required and this will continue at the new site. The application also states that all surface water drainage will be directed to soakaways, with grey water from the shepherds' hut and washroom directed to a sealed treatment unit.

Pembrokeshire County Council Drainage Engineers section has now considered the proposal and do not raise any adverse comments.

A flood risk map has been submitted with the application with confirms that the existing siting of the structures falls within the C2 zone and also confirms that the proposed siting will not fall within the flood zone. Natural Resources Wales has no objection to the current proposal.

Pembrokeshire County Council, Pollution Control have indicated that whilst there is no objection in principle to the current application, additional information is required for further consideration in the form of full details of the existing and proposed sewerage and waste water disposal methods for the shepherds' hut and associated washroom facilities. Further details have now been provided on Drawing 10 which indicates a proposed location for a new 2,600 litre sealed cesspit to replace the above method of foul waste disposal, this new facility is proposed to be installed in accordance with Part H of the current Building Regulations. Based on these details the Pollution Control department do not raise concerns with the amended proposal.

Other Material Considerations:

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 keeping 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 adopted LDP.
The application also includes a financial report to support the proposal and provide information to confirm that the proposal is financially viable. Officers consider that whilst this information confirms the viability of the scheme in financial terms and confirms that this enterprise can provide an income for the applicant's family this does not outweigh the policy concerns raised on the principle of the proposal as set out in the above report.

It is noted that the applicant has also approached The Greener Camping Club regarding the possibility of the site becoming a certified camping site. Further consideration on this matter has been put on hold by the applicant until the current planning application has been determined.

Conclusion

The amended proposal has been considered against the policies of the adopted Local Development Plan, and officers consider that the current proposal is contrary to policies 8, 15, 35 and 38. Policies 35 and 38 indicate that no further new camp sites would be supported. No material considerations have been put forward which would be considered to outweigh the very clear policy position set out in policy 38 of the adopted Local Development Plan, regarding such developments. As such, the application cannot be supported by officers, and the recommendation is of refusal.

Recommendation

The application be refused, subject to the following reasons:

1. Policies 1, 8, 15 and 30 of the Pembrokeshire Coast National Park Local Development Plan seek to protect and enhance the sense of remoteness and tranquillity of the landscape, and prevent development that fails to harmonise with or enhance the landform and landscape character of the National Park. The proposed development – due to its location and siting – fails to protect or enhance the sense of remoteness and tranquillity in the landscape and also fails to harmonise or enhance the landform and landscape character, which is harmful to the special qualities of the National Park, and therefore is contrary to adopted Development Plan Policy Policy 8 – criterion (c), and Policy 15 - criteria (b) and (d).

2. Policy 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan states that new camping, caravanning, static caravan or chalet sites will not be permitted in the National Park. The provision of a new campsite and associated development in a countryside location is therefore contrary to adopted Development Plan Policy 35 – criterion (a), and Policy 38.
Scale as shown when printed at A3
Existing path extended in permeable material slope to be approximately 1 in 12

Shepherd's Hut

Access to neighbouring field

Proposed Decking Level 5.00

Proposed area of planting of native trees as per Ecologist's recommendations

Path formed using quarry scalings with softwood timber boarding at an edge

Level plateau formed at 8.30

Toilet and Washroom

Scale as shown when printed at A3
Item 5c) Item 5d)
2600 litre sealed cesspit
installed in accordance with
Part H of the Building
Regulations

Scale as shown when printed at A3