

**Application Ref: NP/17/0495/FUL**

<b>Case Officer</b>	Kate Attrill		
<b>Applicant</b>	Mr Shannon		
<b>Agent</b>	Mr G Blain, Gerald Blain Ltd		
<b>Proposal</b>	Change of use of 15 camping pitches to 15 static caravans and ecological enhancement		
<b>Site Location</b>	Windmills Caravan Park, Old Narberth Road, Tenby, Pembrokeshire, SA70 8TJ		
<b>Grid Ref</b>	SN12970187		
<b>Date Valid</b>	15-Aug-2017	<b>Target Date</b>	10-Nov-2017

This application is being brought to Committee as a result of the Officer Recommendation being contrary to that of the Community Council.

**Consultee Response**

**PCNPA Park Direction:** Objecting - The proposal would be contrary to Policy 38.

**Tenby Civic Society Chairman:** 1. Though the site is not very visible, static caravans are habitually white and intrusive in the landscape, a matter we would expect to be important in a National Park. Dark wood chalets would be much less conspicuous. The caravan exterior designs appear bald and basic.

2. The ecological report is welcomed, some recommendations should be required as conditions if approval is considered, some of its recommendations are not met in the drawings, eg., spacing caravans to allow planting light trees between them.

3. Traffic analysis (including consultation comments) seem poor. If the caravans are as second homes, traffic is likely would be much less if rented on a week/part week basis, when flows would be higher; this latter use appears likely so issues with the access lane need more care. There would be a loss of some slower moving towed caravans but there could be a need for passing places and speed restrictions.

4. Comments by neighbours have in the main been recognised and met in the proposals (eg., the second cesspit would relieve some justified concern) so the pre-application consultation process has helped.

**PCNPA Tree and Landscape Officer:** Conditional consent.

**PCC - Drainage Engineers:** No objection subject to conditions

**PCC - Transportation & Environment:** No objection

**Dyfed Archaeological Trust:** No objection

**Coal Authority:** Conditional Consent

**PCNPA Planning Ecologist:** Conditional Consent

**Tenby Town Council:** Approve

**Public Response**

The Town and Country Planning (Development Management Procedure)

(Wales) Order 2012 requires that proposed developments are advertised by way of either neighbour letters or a site notice. Only in cases of departures from the Local Development Plan, must both methods be used.

In this case, both methods of notification were utilised as this application is considered to be a departure from the Local Plan.

Three letters of representation have been received objecting to the proposals on the basis of:

- The difficulty of the access lane
- Increased traffic and impact on lane which is privately maintained
- Doubling of the number of static caravans
- Future uses of the park
- Visual blight on the landscape
- Additional sewage impacts
- Potential damage to BT lines

### **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 09 - Light Pollution

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 32 - Surface Water Drainage

LDP Policy 35 - Visitor Economy

LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW9 Chapter 04 - Planning for Sustainability

PPW9 Chapter 07 - Economic Development

PPW9 Chapter 08 - Transport

PPW9 Chapter 11 - Tourism, Sport and Recreation

SPG06 - Landscape

TAN 12 - Design

TAN 13 - Tourism

Pembrokeshire Coast National Park Authority

Development Management Committee – 8<sup>th</sup> November 2017

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## TAN 23 - Economic Development

### **Constraints**

Special Area of Conservation - within 500m  
Hazardous Zones  
Recreation Character Areas  
Low Coal Risk  
High Coal Risk  
Landscape Character Assessment  
Seascape Character Assessment

### **Officer's Appraisal**

#### **Site and Context**

The site is located to the north of Tenby and outside the Centre boundary, defined in the Local Development Plan. It is accessed via an unadopted lane.

#### **Relevant Planning History**

Informal pre-application advice was sought through the agent attending a duty planning surgery, where it was advised that a formal pre-application request for advice be submitted as the enhancement did not appear to be significant to outweigh Policy 38. There was not however a formal pre-application request with any additional detail received prior to this application being submitted.

An Environmental Impact Assessment (EIA) Opinion was sought prior to submission to ascertain whether an EIA would be needed to accompany the application. The opinion of the Authority was that an EIA was not necessary.

The site has planning permission for 15 static caravans, 10 unit pitches (which can be used for touring caravans, camper vans or tents) and 5 tent pitches. The tent pitches were required to be retained for tent-only use when permission was granted to change the use of the pitches to unit pitches in January 2007.

#### **Description of Proposal**

The application seeks to increase the number of static caravans by an additional 15, bringing the site total to 30.

Additional landscaping is proposed to mitigate against the emphasis of Policy 38.

#### **Key Issues**

The application raises the following planning matters:

- Policy and Principle of Development

- Amenity and Privacy
- Access and Parking
- Landscaping
- Biodiversity
- Other Material Considerations

**Policy:**

Policy 38 of the Local Development Plan seeks to control the further provision of caravan, camping and chalet sites in the National Park due to the large number of pitches already available. In some instances the Authority has allowed a changeover of pitch types within existing sites, but this needs to be acceptable in landscape terms and accompanied by significant environmental improvements.

In 2015 the Authority commissioned a study to assess the potential of the National Park landscape to accommodate additional camping and caravan sites. The assessment was undertaken using Landscape Character Areas set out in the Authority's Supplementary Planning Guidance on Landscape Character and Seascape Character. The site is within Landscape Character Area 1. The summary of the assessment details the area as being at capacity because cumulatively the existing sites are having an adverse effect on the landscape character. There is no capacity for new sites or extensions to existing sites and the recommended action for changes within sites is to replace static caravans with pods or glamping tents accompanied by improvements in layout and a reduction in visual impact. The Seascape Character Assessment document makes reference to Caravan Parks reducing tranquillity and scenic beauty.

The proposed change arranges a row of static pitches along the eastern field boundary and a further grouping of 10 pitches around the site track in the centre of the field. The overall pattern is regimented. Additional changes are:

- An area of bramble scrub;
- A new shelter belt of native trees in the south-west corner of the site;
- A new wildflower meadow inside the southern site boundary;
- A new wildlife pond in the south-east corner of the site; and
- A small area of rough grassland and bramble surrounding the proposed pond.

The proposed ecological enhancements are clustered in the southern-most area of the site and do nothing to break up the impact of the existing, nor the proposed static caravan pitches. It is not considered that these proposals offer significant environmental improvement within the site.

The acceptability of replacing tent/touring caravan pitches which are operational for only part of the year with static caravans which will be permanently in situ will need to be carefully assessed in terms of visual impact. Whilst there may be scope to reduce the overall number of units, improve the layout and provide a much greater amount of planting to screen the caravans within the site, the current proposal fails to achieve this.

The proposal would be contrary to the Policy 38 of the Local Development Plan and Policy 15 of the Plan which seeks to protect the qualities and special character of the National Park.

***Access and Parking:***

The County Highways Department have commented as follows:

As stated within the response to the pre-application, there will not be an increase in the peak traffic generation even though the peak season could extend over more months of the year. There will be the benefit to safety of not having towed touring caravans or large motor-homes, and the occupation of static caravans is more often on a weekly basis. The site is within walking distance of the Town; and there is direct access to a Sustrans Cycle Route and to the Coast Path.

When bringing in the Static Caravans, these can be pulled safely off the A478 Road whilst the fairly short distance (350 metres) is secured. There are already similar Static Caravans brought in to other pitches. I have no objections on highway grounds to the plans as submitted.

***Landscaping:***

The Tree and Landscape Officer has been consulted with regards to the proposals and has commented as follows on the submitted information:

- The following detailed information is required:
- Tree Survey
- Tree Protection
- Pre-development tree work
- Details of any landscaping and new planting
- Arboricultural Method Statement for Caravan bases in proximity to retained trees and hedges

Whilst this information is not submitted with the application it could be requested via a pre-commencement condition.

***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 PCNPA Ecologist has been consulted with the proposals and has commented as follows:

*"I have reviewed the application for the change of use of camping pitches to static caravans. I note the Ecological Report produced by Neil Taylor, April 2017. The report concludes that the existing site has limited ecological value and there would be no significant impact as a result of the proposed development. The report sets out recommendations for enhancement and these have been included on the plans.*

*I support the inclusion of the proposed enhancement on site and as long as works are in accordance with Neil Taylors ecological report and the submitted plans then I would have no objection to the proposed development."*

### **Conclusion**

In looking at the significance of the environmental benefits offered, these needs to be assessed in terms of whether they outweigh the principle of caravan parks being expanded within Policy 38.

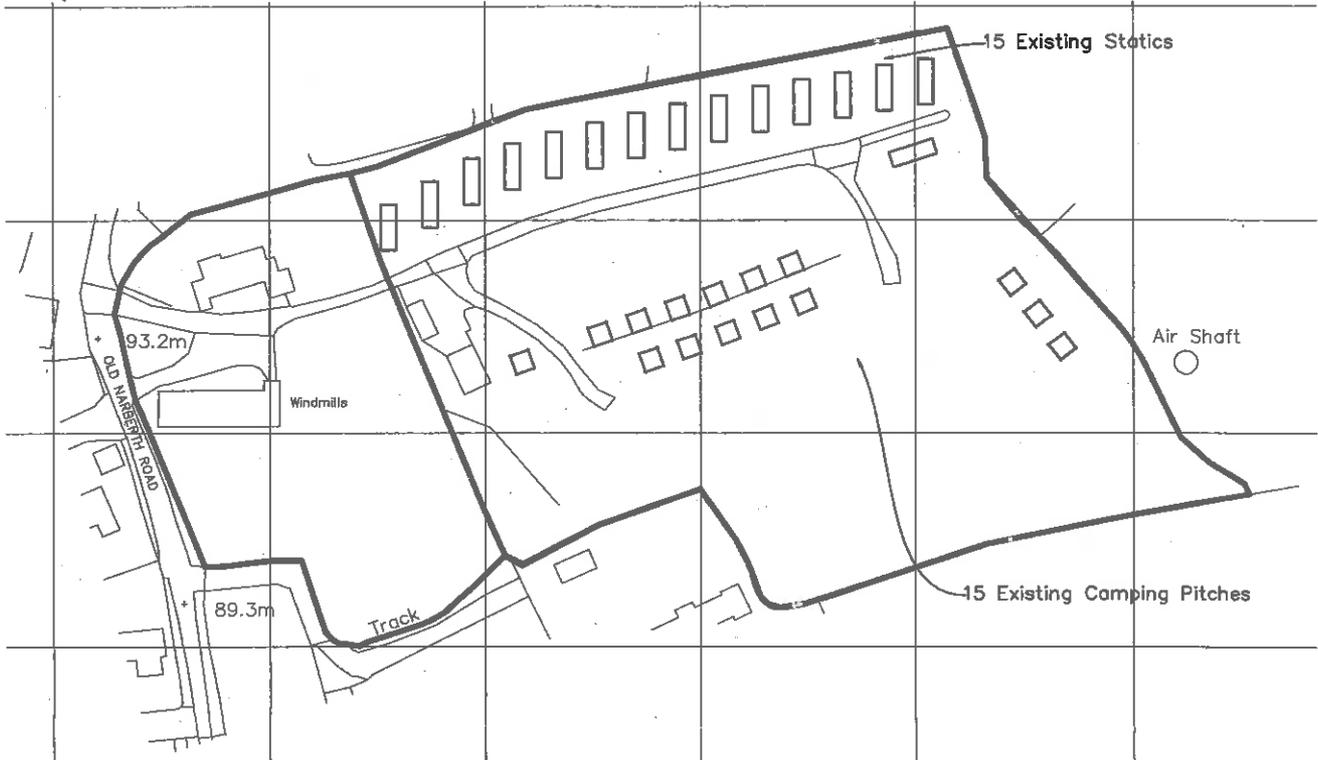
There will undoubtedly be an environmental improvement to the caravan park as a result of the improved landscaping, but what has not been demonstrated is an improvement to the wider setting of the site within the National Park.

In comparative terms, a recent application which was recommended for approval was at Kiln Park, where touring caravans located within the flood plain were re-located outside of the flood plain and a very comprehensive landscaping scheme was offered which would impact on the public views of the park from the town. It is not considered that the significance of the scheme offered here is substantial enough to outweigh Policy 38.

### **Recommendation**

#### **REFUSE:**

The proposal to increase the number of static caravans at Windmills Caravan site does not significantly enhance the setting of the site within the surrounding landscape and is therefore contrary to Policy 38 of the Pembrokeshire Coast National Park Local Development Plan.



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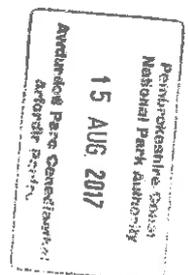
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Email: Gerald@Geraldblainassociates.co.uk

Address: 15 St John Street, Whitland, SA34 0AN

NP 17 4 95



**Job:** Windmills Holiday Park,  
Old Narberth Road,  
Tenby, SA70 8TT

**Drawing Number:**  
01

**Date:**  
05/2017

**Drawn By:**  
D.B

**Checked By:**

**Dwg. Title:**  
Location Plan

**Client:**  
Mr R Shannon

**Scale:**  
1/1250 A3



15 Existing Statics

15 Existing Camping Pitches



- Existing Tent Pitches
- Existing Statics

Job: Windmills Holiday Park, Old Narberth Road, Tenby, SA70 8TT	Drawing Number: .02	Date: 05/2017
Dwg. Title: Block Plan Existing	Drawn By: D.B	Checked By:
	Client: Mr R Shannon	Scale: 1/500
		A2

Pembrokeshire Coast  
National Park Authority  
15 AUG 2017  
Revised Plan  
15/08/17

NP 17 4 95

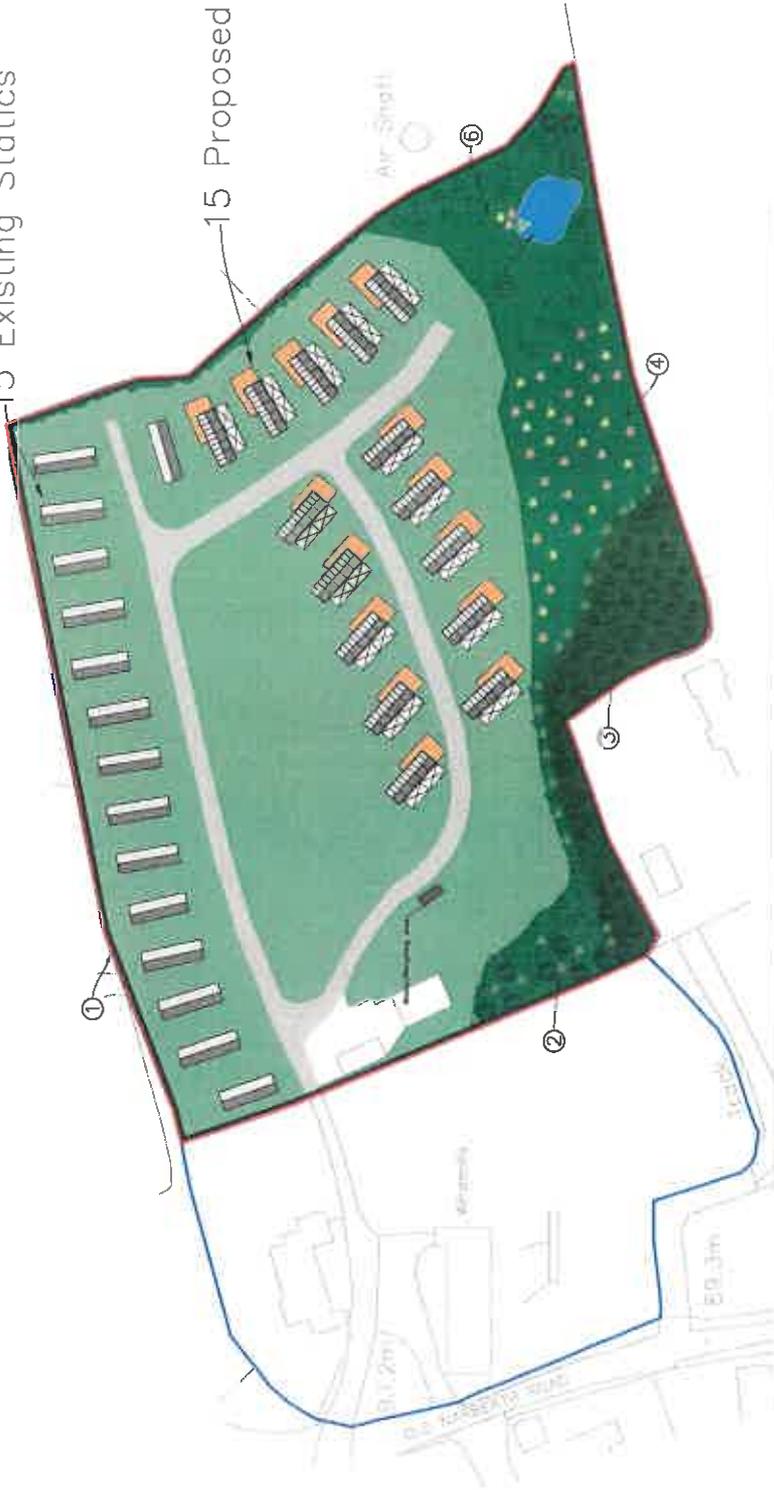
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15 Existing Statics

15 Proposed Statics



**Key**

-  Existing Statics
-  Proposed Statics with decking

- Drawings Detail**
1. Retained boundary masonry, and existing fence to remain.
  2. Proposed block
  3. New boundary wall in native trees
  4. New finished ground
  5. New utility hole
  6. Rough depressions and drainage details surrounding the proposed block and South Eastern site.

NP 17 4 95



Drawing Number:	03	Date:	05/2017
Drawn By:	D.B	Checked By:	
Client:	Mr R Shannon	Scale:	1/500
Dwg. Title:		Block Plan Proposed	

Job: Windmills Holiday Park,  
Old Narberth Road,  
Tenby, SA70 8TT

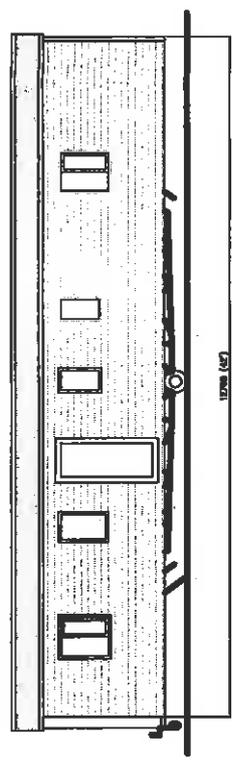
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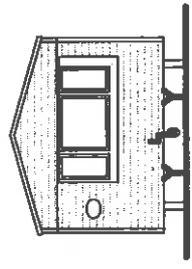


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 National Park Holiday Park  
 15 AUG 2017  
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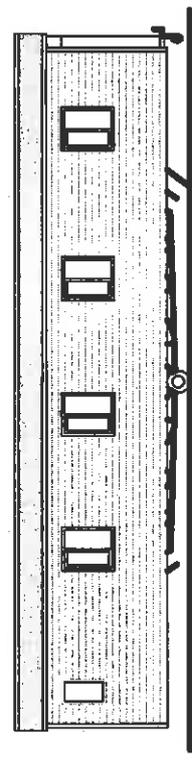
NP 17 4 95



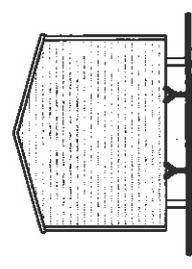
front elevation



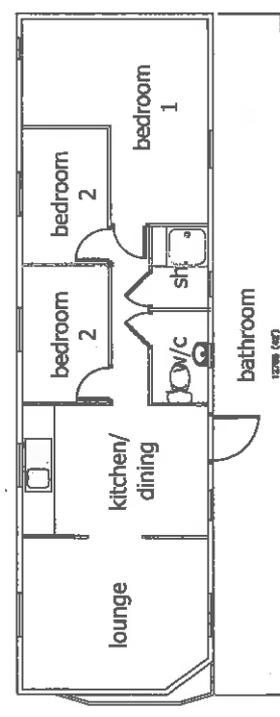
end elev.



rear elevation



end elev.



plan view

**EXTERIOR**  
 Onduline Pantile Roof  
 Domestic Gutters & Down Pipes  
 Painted Chassis  
 Pregalvanised Chassis  
 Fully Galvanised Heavy Duty Chassis  
 Aluminium Cladding  
 Extra Insulation  
 uPVC Double Glazing



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Job: Windmills Holiday Park, Old Narberth Road, Tenby, SA70 8TT	Drawing Number: 05	Date: 05/2017
Dwg. Title: Proposed Static Caravans	Drawn By: D.B	Checked By:
	Client: Mr R Shannon	Scale: 1/100
		A3

15 AUG 2017



Existing



Proposed

NP 17 4 95



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Job: Windmills Holiday Park, Old Harberth Road, Tenby, SA70 8TJ	Drawing Number: 06	Date: 06/2017
	Drawn By: CTS	Checked By:
Title: Existing & Proposed aerial visualization	User: Mr R Shannon	Scale: N/A



15 Existing Statics

15 Proposed Statics



NP 17 4 95



Job: Windmills Holiday Park, Old Narberth Road, Tenby, SA70 8TT	Drawing Number: 03	Date: 05/2017
Drawn By: D.B	Checked By:	
Client: Mr R Shannon	Scale: 1/500	A1
Dwg. Title: Topographical Survey		

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