Application Ref: NP/18/0559/FUL

Case Officer	Nicola Gandy		
Applicant	Mr D Brown & ATEB		
Agent	Mr G Blain, Gerald Blain Ltd		
Proposal	14 affordable housing units, 2 open market houses and upgrading 85 tents and tourers to 85 static caravans with associated landscaping and roads. New pumping station.		
Site Location	Buttyland Caravan Park, Station Road, Manorbier,		
	Pembrokeshire, SA70 7SN		
Grid Ref	SS06869914		
Date Valid	24-Sep-2018 Target Date 23-Jan-2019		

The application is reported to the Development Management Committee for determination as the application is a major development.

Consultee Response

PCNPA Planning Ecologist: Concern - Further information required.
Natural Resources Wales: Concern
PCNPA Tree and Landscape Officer: Further information required
Dwr Cymru Welsh Water: Conditional Consent
PCC - Transportation & Environment: Conditional Consent
Dyfed Archaeological Trust: No adverse comments
Manorbier Community Council: Recommend Refusal

Public Response

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

Letters of objection were received from 3 local residents. The material objections are summarised below and full copies of the objections are available to inspect on the application file:-

- Contrary to LDP policy
- Impact of caravans and pumping station on landscape
- Need for affordable housing
- There is only planning permission for 35 caravans and 15 tents
- Traffic increase and highway safety
- Impact on the school
- Viability of the proposal is lacking
- No draft S106 agreement
- Use of static caravans as permanent residents
- Sewer capacity
- Design

Pembrokeshire Coast National Park Authority Development Management Committee – 23rd January 2019

- Density
- Sustainability of location
- Light pollution
- Landscaping
- Lack of amenity space
- Noise
- Query in relation to the school occupying the land

The majority of the objections are addressed in the main body of the report, however, the following comments are made in relation to objections not covered:-

- In respect for the need and amount of affordable housing Planning Policy Wales 10, which states at para 4.2.25 that 'A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications . Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers'. This development would meet a proven need for affordable housing to serve the Community Council area.
- In respect of the concern in relation to light pollution, if the application were recommended for approval it would be subject to a condition requiring a lighting scheme to be submitted to and agreed in writing by the local planning authority.
- The most recent Pembrokeshire County Council's Admissions to Schools information confirms that there is capacity for 86 pupils, with the current number on the roll being 56. The development would, therefore, not be considered to result in additional pressure on the local school.
- In respect of the school occupying the land, the Local Planning Authority is not aware of any such proposal.
- If the caravans were considered acceptable a condition would be attached to any permission granted to ensure that the caravans are not used as permanent residences.
- The majority of the proposed properties are to be provided by a registered social landlord who would assess the viability of a scheme prior to progressing it.

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 06 Rural Centres
- 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 39 Upgrading Statics, Touring Sites and Tent Pitches
- LDP Policy 44 Housing
- LDP Policy 45 Affordable housing
- LDP Policy 52 Sustainable Transport
- LDP Policy 53 Impacts on traffic
- PPW10
- SPG06 Landscape
- SPG08 Affordable Housing
- TAN 02 Planning and Affordable Housing
- TAN 12 Design
- TAN 13 Tourism

Constraints

LDP Allocation LDP Mineral Safeguard LDP Open Space Historic Landscape Potential for surface water flooding LDP Centre:50pc aff housing;30 units/ha Recreation Character Areas Landscape Character Assessment

Officer's Appraisal

Description of Development and Site

The application seeks planning permission for the following:-

- 14 No. Affordable housing units
- 2 No. Open market houses
- Upgrading of existing caravan park from 70 seasonal touring pitches and 15 tents pitches to 85 year round static caravans
- New sewage pumping station

The proposed affordable housing will be comprised of a mixture of 2, 3 and 4 bedroom two storey houses and 1 and 2 bedroom bungalows, with associated car parking and gardens. Access to the site will be gained via the highway to the west.

The proposed 2 open market dwellings will comprise 2 No. 2 bedroom bungalows with associated car parking and gardens. Access to the site will be gained via the entrance to the 14 affordable houses off Station Road .

The upgrading of the caravan park proposes changing the existing permissions on the site from 70 tourers and 15 tents to 85 static caravans, with associated landscaping.

A sewerage pumping station is also proposed along the northern boundary of the caravan site and access to this will be gained via a proposed separate access point directly off the highway.

The application site is a long established caravan site located on the eastern flank of Station Road running north toward Manorbier Station. The caravan site area straddles the Rural Centre boundary, as defined by Policy 6 of the Local Development Plan, with the eastern part of the site (the caravan and camping site) falling in the open countryside.

Relevant Planning History

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 (NP/17/0221/SCO refers)

NP/17/0691/FUL - 14 affordable houses, 2 open market houses, 85 static caravans and pumping station – Withdrawn 5th June 2018

NP/17/0597/S73 - Variation of conditions 2 & 5 of NP/15/0526/FUL (Clubhouse) – Withdrawn 24 January 2018

NP/17/0596/CLE – Use of the south field as a touring & camping field for up to 140 touring caravans and tents at any one time on a seasonal basis for holiday purposes only from 1st March up to 28th September in any one year. - Refused 27/11/2017

NP/17/0258/FUL - Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of portacabin as a temporary reception office. – Approved 9th August 2017

NP/17/0082/FUL – Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of portacabin as a temporary reception office, extend holiday season and winter storage - Refused 10th April 2017

NP/17/117/NMA – Non material amendment alteration in fenestration material – Approved 8th March 2017

NP/17/171/NMA – Non material Amendment – Increase in height of building – Withdrawn 6th April 2017

NP/16/0502/FUL – Amendment to NP/15/0526/FUL comprising change of use of first floor staff/managers accommodation to guest rooms and alterations to clubhouse - Withdrawn 6th February 2017.

NP/15/0526/FUL – New Club House – Approved 16th December 2015.

NP/15/0131/FUL - 35 No. Caravans for winter storage in the western field - 10th January – 28th February - Approved 3rd June 2015

NP/13/260/CLE - 35 No. touring caravans or tents in the northern field – 1^{st} March – 28^{th} September – Granted 8^{th} August 2013

NP/464/93 – Use of site for 35 touring caravans and 15 tent pitches between – Approved 1994

Key Issues

The application raises the following planning matters:

- Policy and Principle of the Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity
- Highway Safety
- Biodiversity
- Drainage

There has been extensive pre-application discussion by your officers with the agent and landowner and the housing association regarding the principles of such an application. Your officers considered there was potential to release an allocated housing site, provide long term environmental gains through the development of strategic landscaping and improved sewerage for the settlement. However, such a proactive and holistic planning solution requires a negotiated package – including land allocation, timing and construction phasing, all which would require legal agreements to secure the planning gains. Although this potential remains, your officers have concluded it is not realised in the form of this present application and must recommend accordingly.

Policy and Principle of the Development

The application proposed a mixed development with two main elements, housing and the redevelopment of the caravan park to accommodate 85 year round static caravans.

Housing

The application site is partly located in Manorbier Station - a defined Rural Centre within the Local Development Plan (LDP), the application site forms part of an allocated site for mixed use purposes as part of the strategic aims of the plan. The aims of Policy 6 – Rural Centres are to a) to meet the housing, in particular affordable housing needs, b) to encourage small scale employment developments and c) to protect and enhance the Centre's range of facilities.

The application site is partly located on an LDP allocated site for a mixed use development (Allocation reference: MA895). The allocation is for residential (15 units) and educational purposes. The application proposes a mixed use of residential and tourism, which is not strictly in accordance with the allocation, however no proposal from the school has come forward in the lifetime of the LDP.

Policy 45 – Affordable Housing requires the provision of affordable housing units on each allocated site. In this instance the required affordable housing contribution amounts to a provision of 45% on site contribution , however the development proposes 87% of the housing proposed to be affordable, as such , the development is considered to comply with Policy 45 of the LDP and the Authority's Supplementary Planning Guidance on Affordable Housing (November 2014). A draft legal agreement was submitted with the application.

It is considered that the increase in housing density of the development in comparison to the housing numbers as set out in the LDP allocation (i.e 15) is not significant and can be accommodated on the site.. Consequently the housing element of the development – in principle – would be acceptably sited within the Rural Centre.

The application proposes 14 affordable housing units and 2 open market units. The site is located within a Rural centre and on a site already allocated for housing provision, as defined by the adopted LDP, the established principle of housing at this location has therefore already been examined and accepted.

Caravan Park

The planning position for this site following the grant of planning permission in 1994 (NP/464/93) sets out that the site has planning permission to accommodate 35 touring caravans and 15 tent pitches not between the period of 10th January and 28th February in any one year.

In 2015 planning permission was granted for the winter storage of 35 No. touring caravans on the site, where the housing is proposed, between the period of 10th January and 28th February in any one year.

A certificate of lawfulness was granted by the Authority in August 2013 (NP/13/0260 refers) which allowed the provision of an additional 35 touring caravans on the north field between March and September in any one year. The grant of a certificate for 35 touring units is not a permanent use of the land but is a material consideration. As a result there is approval for a maximum of 70 seasonal touring caravans and 15 seasonal tents on the site during the months of March – September. Outside of these months there should be no more than 35 caravans on a restricted part of the site at any one time. The Authority has served a Breach of Condition notice on the landowner as these numbers have been breached and the land-use is currently compliant with the notice.

Local Development Plan policies 35, 38 and 39 deals specifically with caravan sites and the provision of amended or altered pitches.

Policy 38 makes clear that new camping sites or the extension of existing sites by an increase in the number of pitches or enlargement of the site area will not be permitted. It states, however, that 'exceptionally' static caravan and chalet sites may be enlarged where this would achieve an overall environmental improvement for the site and its setting.

Although the site is not being spatially enlarged, the replacement of seasonal touring pitches with static caravans all year round it is essentially an application for an increase in numbers throughout the year. Consequently,, the application is considered to be contrary to Policy 38 of the LDP. Notwithstanding this the application makes some provision for environmental improvements, which is discussed in the Visual Amenity and Special Qualities of the National Park section of the report below.

In certain circumstances the Authority has permitted a change over from touring caravan to static pitches where the number of overall units has reduced <u>and</u> where environmental improvements have been made to help reduce the overall impact of the site. In this instance, however, as the proposal seeks to exchange 85 seasonal touring and camping pitches for 85 year round static pitches, there is no environmental benefit by means of a reduction in numbers and in fact the provision of 85 static caravans would result in an intensification of the use of the site, contrary to the aims of the LDP.

Policy 39 is also applicable to the proposed development as it refers to the upgrading of 'touring sites'. Policy 39 states that the upgrading of touring caravan or tent pitches to other forms of self-catering accommodation will be permitted, where: a site lies within a Centre; **and** the proposal forms part of a rationalization scheme that will result in environmental benefits in terms of layout, design and materials used; **and** the proposal complies with policy 35 (c) (Visitor Economy).

The caravan site element of the application falls outside of the Rural Centre of Manorbier Station and, as such, is contrary to Policy 39. In terms of environmental

benefits, whilst the application does propose some additional landscaping this is not considered sufficient to mitigate the visual impact of the 85 year-round static caravans and the pumping station on the surrounding landscape, consequently the development is contrary to policy 39 of the LDP.

Having regard to the above the proposed development would be contrary to the requirements of the Local Development Plan policies 38 & 39. Consequently, the proposed replacement of 70 seasonal touring pitches and 15 seasonal tent pitches with 85 year round static pitches is not considered acceptable in principle.

Visual Amenity and 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. Particularly relevant to this application area priorities a) sense of remoteness and tranquility is not lost and wherever possible enhanced and c) pattern and diversity of the landscape is 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').

The application site lies within Landscape Character Area 04 Manorbier/Freshwater East as defined by the Landscape Character Assessment Supplementary Planning Guidance. The area's special qualities are listed in this document, one of which is as follows:-

'There is a very strong historical and cultural sense of place here, which is very different from that encountered in north and west Pembrokeshire, typified by the Medieval open field system which has survived remarkably well in the area - the stripfields which lie either side of the Ridgeway between Lamphey and to the south of St Florence. The wealth of historical and archaeological sites documented means that extensive areas of historic landscapes have an outstanding value attributed to them. Of particular note are the Medieval buildings: the Lamphey Bishop's Palace, a moated house site at Hodgeston and the extremely well preserved manorial landscape of Manorbier, with its imposing castle dominating the village scene, the prominent church and a dovecote. The historical value in turn supports'

Notwithstanding the development being contrary to Policies 38 & 39 of the LDP, the applicant has proposed a landscaping scheme in order to attempt to mitigate against the visual impact of the proposed 85 static caravans.

During the Pre-application Consultation Natural Resources Wales were consulted by the applicant's agent and advised that any further planning application should be accompanied with the Landscape Assessment of the scheme. Unfortunatley, application as submitted does not include a Landscape Assessment and, as such, Natural Resources Wales has raised serious concerns in respect of the application on the basis of the landscape implications. Whilst this information is lacking, officers based on their own site inspections consider that the proposed development is against policy and would have a significant adverse visual impact on the National Park, particularly when viewed from the north and as such a Landscape Assessment has not been requested by the Authority at this time.

In terms of landscaping, the application proposes increased screen planting around the caravan site boundaries, some central planting areas, a planting bund and a wildlife area with the aim of improving the environment of the site and its setting in the surrounding landscape. The majority of the existing trees and hedges to the site boundaries are to be retained with the removal of 25m of roadside hedge for access to the proposed pumping station.

However, a large proportion of the planting proposal are for small low growing trees and shrubs, which will not provide sufficient screening of the caravan site. There are some large growing species proposed, but it is not considered that the landscaping proposed would be sufficiently significant and beneficial as to override the policy position.

In terms of the impact of the development on the wider setting, it is considered that the proposal to allow 85 static caravans in place of seasonal touring and tent pitches would result in a large extension to the built form of the existing village, outside of the rural centre, to the detriment of the rural character of the area.

Furthermore, the Landscape Character Assessment for the area identifies caravan parks as one of the discernible landscape trends in the area and states that caravan parks have eroded the visual quality in places. By allowing the proposed replacement of the seasonal touring caravans with 85 year round statics in the formation proposed, the development will further erode the visual quality of the area.

The proposed static caravans will measure 12.76m in length by 3.64m in width and reach a maximum height of 3.24m. Each caravan will have a private deck area and will be finished with aluminum cladding, UPVC glazing, and onduline pantile roof. Limited information in respect of colours has been submitted, however, this detail could be addressed by a suitable condition. It is noted that the caravans proposed do not included any renewable energy features.

The development would result in 85 year-round caravans which, due to their position, layout, design and materials will be highly prominent in the landscape when travelling from the north from the Ridgeway, to the detriment of the special qualities of the National Park and the immediate visual amenities of the area.

In respect of the housing, this element is located on an area which is currently used for caravans all year round (winter storage area) and is within the built form of Manorbier Station, as such, the proposed houses are not considered to have an adverse impact on the wider landscape. In terms of design the houses are traditional in form and materials and additional landscaping could be dealt with by means of conditions.

In respect of the pumping station, the details submitted indicate that there will be a significant amount of hardstanding proposed together with boundary fencing, details of which are not provided, there is the potential that this would have a detrimental urbanising visual impact on the rural character of the area.

Having regard to the above, the proposed development is considered to include insufficient environment improvements to mitigate against the impact of the proposed static caravans, adversely affecting visual amenity and the special qualities of the National Park, which is contrary to polices 8,15,35 & 38.

Neighbouring Amenity

Policy 30 of the Local Development Plan refers to matters of amenity, and requires proposals to be appropriate to where people live and work, compatible with its setting, should not lead to an increase in traffic, odour, noise or light, and should not be visually intrusive.

The application proposes a residential development which would generate some amount of noise, however, the residential noise associated with these 16 dwellings on an allocated site is not considered to be so significant as to warrant refusal of the application.

In respect of the 85 static caravans, again these would be year round caravans and some increase in noise would be expected. However, this noise again would be similar to residential noise and is not considered to generate an unacceptable level of noise.

In respect of the amenity of future occupiers of the dwellings they have been design so as to ensure there is no adverse overlooking, overshadowing or dominance. Whilst the gardens are modest in scale they are considered to be proportionate to the scale of the dwellings proposed, which are also modest.

Having regard to the above the proposed development is considered to be acceptable in terms of amenity and to comply with policy 30 of the LDP.

Highway Safety

The objections received raised concerns in respect highway safety.

The application has been assessed by the Highways Authority which considers that the proposed change to static caravans will not lead to an increase in peak traffic generation from the site and there will be a highway safety benefit of a reduction in touring caravan movements on the approach roads. In respect of the proposed housing and the pumping station entrance the Highway Authority has raised no objection to the development in terms of highway safety subject to a condition requiring detailed plans of the access roads.

Biodiversity

Policy 11 refers to the protection of biodiversity, and requires that development that would impact on habitats and species will only be permitted subject to suitable mitigation. The application was submitted with an Extended Phase 1 Ecological Survey covering the entire site which found that there was likely to be no adverse impacts on protected species. The application has been assessed by the Authority's Ecologist who has no objection to the proposal subject to a condition.

Drainage

Policy 29 of the LDP requires all development proposals to be well designed in terms of water and drainage (criterion 'h'), Policy 32 requires development proposals to incorporate sustainable drainage systems for the disposal of surface water on site.

The Drainage department at Pembrokshire County Council was consulted as part of the application and has raised no objection to the proposal in respect of surface water drainage subject to a condition.

In respect of foul water drainage the application proposes a pumping station to the north western boundary of the site, which will be served by its own separate access, and will serve both the proposed static caravan site and the housing development. Welsh Water /Dwr Cymru have assessed the scheme and have no objection subject to conditions.

Conclusion

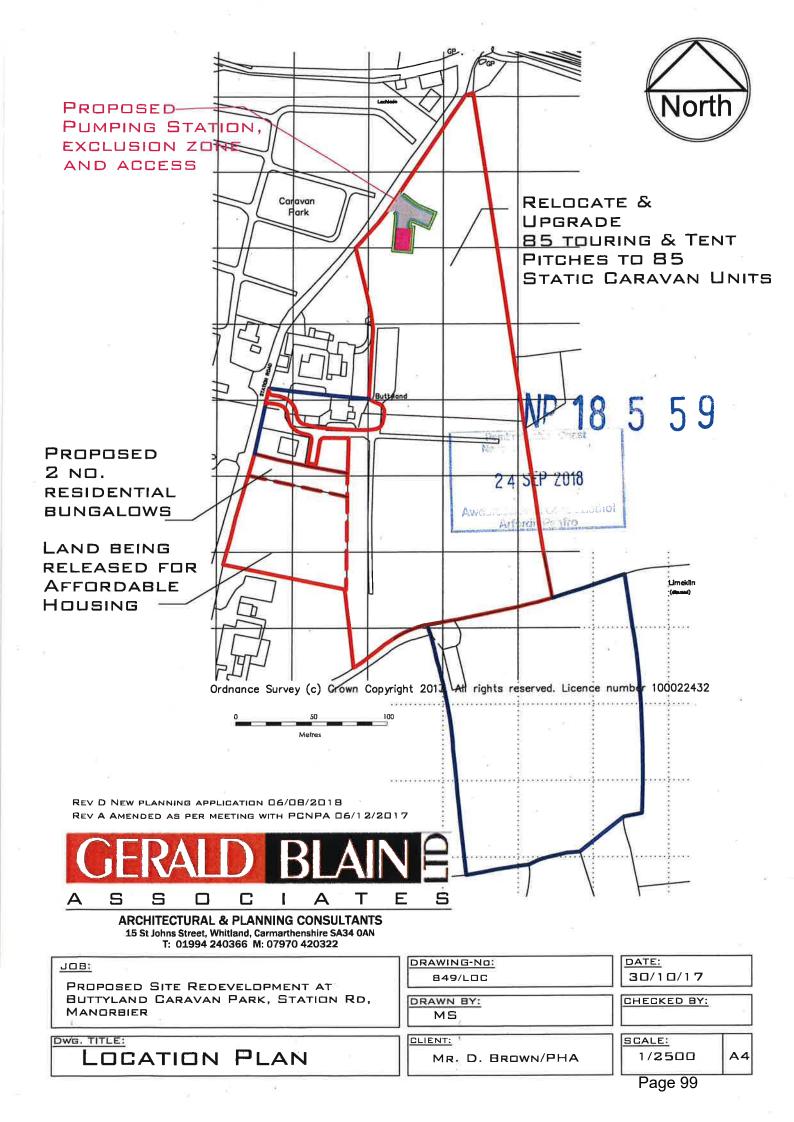
The proposed development has been considered against the policies of the adopted Local Development Plan and it is considered that the development would result in an insensitively and unsympathetically development within the National Park to the detriment of the rural landscape and the special qualities of the National Park.

Whilst, certain elements of the development are acceptable, the proposed change from 85 seasonable touring caravan and tent pitches to 85 year round static caravan pitches is contrary to Policies 38 and 39 of the LDP which indicate that no extensions to existing caravan sites will be permitted and that touring caravan sites should only be upgraded where they lie in a rural centre. No material considerations have been put forward which would be considered to outweigh the clear policy position set out the adopted LDP, regarding such developments, as such, the application cannot be supported.

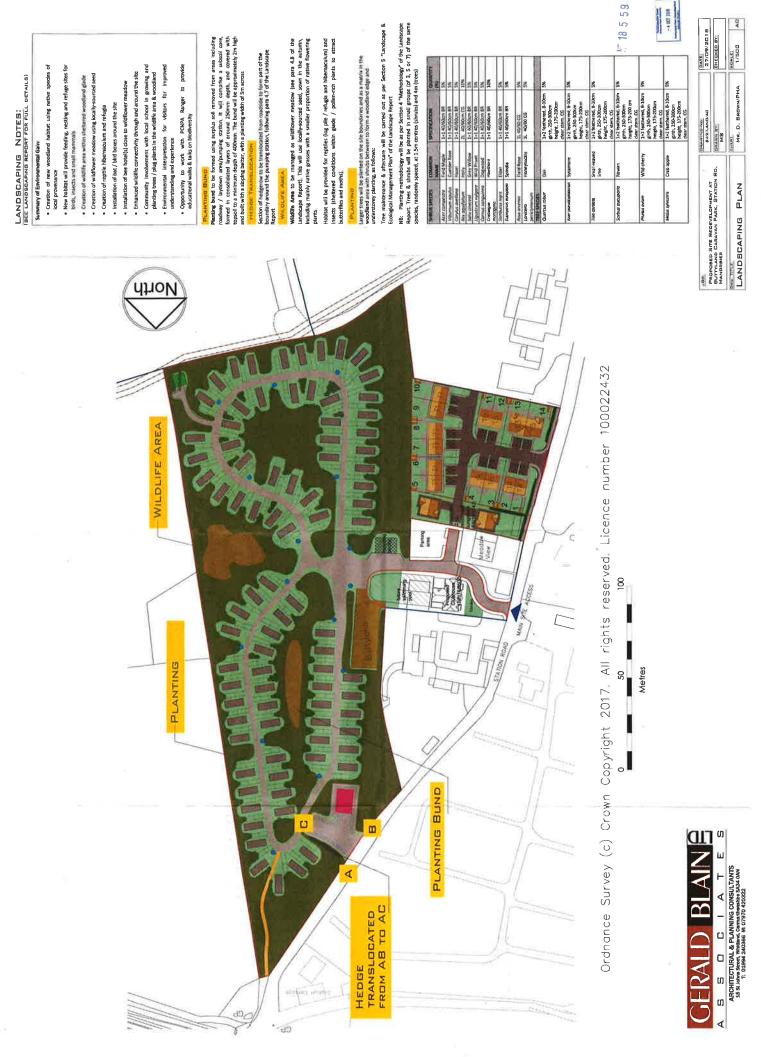
Recommendation

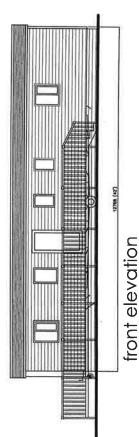
REFUSE, for the following reasons:

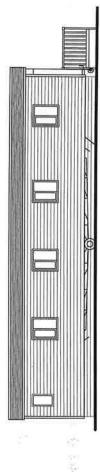
- 1. The proposal to increase the use of the pitch numbers on site by allowing 85 year round static caravans on a site located in a countryside location will result in an adverse impact on the landscape and the special qualities of the National Park, which is contrary to polices 8, 15, 35, 38 & 39 of the Local Development Plan.
- 2. Policies 1, 8 and 15 of the Pembrokeshire Coast National Park Local Development Plan seek to protect and enhance the pattern and diversity of the landscape, and prevent development that fails to harmonise with or enhance the landform and landscape character of the National Park, that is insensitively and unsympathetically sited within the landscape and visually intrusive. The proposed development forms a visually intrusive and discordant addition to this rural area that is harmful to the special qualities of the National Park and therefore contrary to policies 1, 8 and 15 of the adopted Local Development Plan Policy and Supplementary Planning Guidance on Landscape Character Assessment.



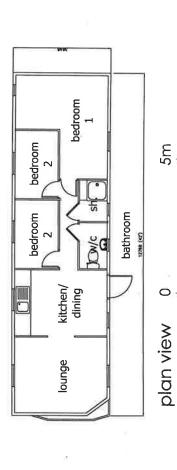








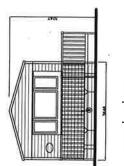
rear elevation

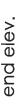


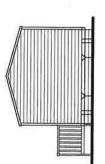
GERND BLANG BLA

ARCHITECTURAL & PLANNING CONSULTANTS 49 - 50 New Road, Chippentam, Wiltshire SN15 J1L 51 Johns Street, Whitland, Carmathenshire SA34 0AN 1: 01249 400800/013994 240366 M: 07970 420322

<







end elev.

pott-

Award C

Free Constant Constant

24 SEP 2018

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

DATE: 1 B/05/2017	CHECKED BY:	SCALE: A3
DRAWING-NO: 849/200/01	DRAWN SY	GUIENT MR. D. BROWN/PHA
PROPOSED SITE REDEVELOPMENT AT	BUTTYLAND CARAVAN PARK, STATION RD, Mandreier	DWD. TITLE STATIC DARVAN (TYPICAL LAYDUT)

Page 102