

Application Ref: NP/19/0286/ADV

Case Officer Andrew Richards
Applicant Ms R Sula, National Trust
Agent Adam O'Donovan, National Trust
Proposal 10 no. Car Park Signs at 3 National Trust car parking areas.
Site Location Freshwater West Car Parks, Castlemartin, Pembroke, Pembrokeshire, SA71 5HW
Grid Ref SR8857
Date Valid 28-May-2019 **Target Date** 22-Jul-2019

The application for advertisement consent is reported to the Development Management Committee at the request from a member of the Authority.

Consultee Response

PCNPA National Trail Officer: No objection

PCNPA Planning Ecologist: No recommendations to make but requires informative note

PCC - Transportation & Environment: No objection

Natural Resources Wales: No adverse comments

Angle Community Council: Angle Community Council are not opposed to this application but have concerns about the impact this might have on overnight parking at West Angle bay and would like to know how the situation at both sites will be monitored and enforced.

Public Response

Site notices were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

588 letters of concern/objection have been received at the time of writing this report and relate to the following matters that can be considered by an application for advertisement consent:

- Proliferation of signage at these locations
- Visual impact
- Scale and design of proposed signage
- Highway safety

The above matters have been addressed within the main report.

The objections also raise concerns in respect of the principle of overnight parking and other matters which are not relevant when considering an application for advertisement consent.

The Authority has also been made aware of an online petition raising concerns/objections to the proposal which has gathered 7,745 signatures at the time of writing this report. The petition focuses on the principle of overnight parking, which is not relevant to an application for advertisement consent.

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 10 - Local Sites of Nature Conservation or Geological Interest

LDP Policy 11 - Protection of Biodiversity

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 21 - Minerals Safeguarding

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 35 - Visitor Economy

LDP Policy 53 - Impacts on traffic

PPW10

SPG05 - Sustainable Design

SPG06 - Landscape

SPG10 - Safeguarding Mineral Zones

SPG21 - Recreational and Leisure Activities

SPG22 - Seascape Character

SPG23 - Enabling Sustainable Development in Welsh NPAs

TAN 07 - Outdoor Advertisement Control

TAN 12 - Design

TAN 18 - Transport

Constraints

Special Area of Conservation - within 500m

Special Protection Area - within 500m

Site of Special Scientific Interest - within 50m

LDP Mineral Safeguard

Biodiversity Issue

ROW Coast Path - within 10m
Potential for surface water flooding
Recreation Character Areas
Affordable Housing Submarkets
Seascape Character Areas
Within Site of Special Scientific Interest consult NRW / Planning Ecologist_20m

Officer's Appraisal

Background and History

The application site spans across the three existing car parking areas which serve Freshwater West. These have been identified as North Car Park, Main Car Park and Quarry Car Park. The sites and the surrounding area are owned by the National Trust (NT).

Concerning the overnight parking situation at Freshwater West, after the grant ceased in 2008 to pay for a Freshwater West Ranger, the Ranger team at Stackpole have been undertaking regular weekend early morning patrols and daily patrols during the summer. They have informed the people staying overnight that they are breaking the NT bylaws and asked them to leave. NT placed signs in all three of the car parks, which have been vandalised on a yearly basis. The rangers also leave advisory notices on the vehicles and in tents and then regularly have to clean up the mess that has been left behind.

The NT has been in discussion with the relevant bodies over the last several months to provide a solution to the current unauthorised overnight camping issues at these sites to ensure the landscape can be maintained in a favourable condition.

- NP/99/336 – Stationing of mobile van for the sale of hot snacks and ice cream during the summer months – Approved 23.08.1999
- NP/04/297 – Mobile van for sale of hot snacks & ice cream – Approved 07.07.2004
- NP/05/438 – Extension of Car Park to Provide Safe Area for Traders Vehicles (Retrospective) – Approved 17.11.2005
- NP/06/080 – Surfing tuition & surf equipment hire concession – Approved 09.05.2006
- NP/07/370 – Sale of ice cream & hot snacks during the summer season – Approved 06.09.2007
- NP/07/551 – Surfing tuition & surf hire equipment concession run from mobile vans & trailer – Approved 08.01.2008
- NP/09/049 – Surfing tuition & surf hire of equipment concession run from 3 units (Vans & Trailer) plus 'A' board & flag pole – Approved 31.03.2009
- NP/11/126 – Summer season mobile catering/ice cream van concession – Approved 26.05.2011
- NP/12/0524 – Designated area for surf tuition and hire business – Approved 07.01.2013

- NP/13/0403 – Change of use of land to memorial site including the siting of two memorial stones with engraved plaques together with a new wooden boundary around sanded memorial garden – Cancelled 03.10.2013
- NP/14/0563 – Change of use of land to memorial site including the siting of a memorial stone with engraved plaques together with associated landscaping – Approved 09.12.2014
- NP/15/0308/ADV – Dibond map mounted on toilet block for visitor interpretation – Approved 14.07.2015
- NP/18/0440/S73 - Variation of condition no's 2 & 4 of NP/11/126 to allow operation between Easter to January and the hours 7am - 9.30pm – Approved 20.09.2018

Current Proposal

The application seeks temporary advertisement consent (12 months) for 10 No. car park signs at 3 NT car parking areas serving Freshwater West beach. All the signs will be mounted on metal poles having a maximum height of 1600mm and are provided on a black background with white writing.

Two of the signs will be double sided and face the temporary overflow carpark at the Main Car Park site. Even though the existing sign on the gate to the overflow car park states 'These gates will be locked at 5pm' the visitors often do not adhere to this and the gates have to remain open for access. The proposed signs will enable the gates to remain open for longer and result in the removal of the original sign together with all the other existing signs which relate to overnight parking at all three sites.

The proposed signage is not illuminated.

Key Issues

In determining applications for advertisement consent, the local planning authority is only able to consider the issues of amenity - the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest, and public safety - the safety of any person who may use any road, railway, waterway, dock, harbour or aerodrome, and whether any display of advertisements is likely to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air.

The application, therefore, raises the following matters which can be considered as part of an application for advertisement consent:

- Impact on Amenity
- Impact on Highway Safety

Although covered by separate legislation the impact on Biodiversity has also been considered as part of the application.

Impact on Amenity:

Technical Advice Note (TAN) 7 (Outdoor Advertisement Control) offers specific advice in the case of National Parks advising that close scrutiny of applications for advertisement consent is required. Paragraph 19 states:-

"In National Parks, Areas of Outstanding Natural Beauty and conservation areas, stricter controls usually apply to the display of advertisements which do not require the local planning authority's express consent. Applications for express consent also need to be closely scrutinised to ensure that the proposals do not compromise the aims of an area's designation."

In considering the application 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) and Seascape (SCA) Supplementary Planning Guidance (SPG) of which the current site straddles the boundary of LCA 8 (Freshwater West) and SCA 34 (Freshwater West).

LCA 8 recognises that this is an area of gently undulating open landscape dominated by sand dunes backed by marshy fields. The area has a close visual and sensory association with the coast which adds to the sense of place, especially when strong south-westerly winds blow and raises high surf along the broad sweep of exposed beach and rocky foreshore.

This LCA was defined by its vast stretch of sand beach backed by an extensive system of fixed sand dunes, which are very rare in the National Park. Although there is a well-used public road passing through the dune system, its alignment and the scale of the adjacent dunes mean that it is not visible for much of its length along the low ground, thus contributing to the sense of remoteness of this place.

The high level of exposure, together with its relative isolation and lack of settlement, contribute strongly to a pervading sense of remoteness and wilderness here, evoked by the wind-swept undulating sand dune landscape, this in spite of the proximity of the Castlemartin firing ranges and the tops of high stacks at the Valero oil refinery which intrude above the horizon to the north-east. The management guidance seeks to retain and conserve the sense of remoteness.

SCA 34 recognises this area with a large, west facing sandy beach with rocky outcrops, Freshwater West is known for large waves and strong dangerous currents with a wild character. The beach is flanked by a large sand dune system, sandstone cliffs and wave cut platforms. The area is low key, with recreational use of the beach, informal paths through the dunes and car parks.

The SCA details the forces for change within this area as coastal managed re-alignment to allow the dune system to function naturally, visitor pressure, and natural forces from wind on the dune system, effect of activity on firing ranges and management of the coastal landscape for nature conservation purposes.

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategy 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', 'b' and 'd' resisting development that would cause significant visual intrusion, be insensitively and unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park. Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a').

The proposed signs are modest in scale and have been sited adjacent to existing infrastructure, such as the toilet block, boundary fences and gates where possible to minimise the visual impact of the proposed temporary signage.

The purpose of the signage is to attempt to reduce the overnight camping at the sites, which in itself creates a far more significant visual amenity impact than the proposed signage. The proposal also includes the removal of existing signage as detailed on drawing reference: ADPL: 001/1 which will assist in maintaining the character of the area and seeks to reduce the cumulative effect on visual clutter and therefore preserving the special qualities of the National Park.

The proposed signs are considered to be adequately sited within the landscape to be visible by motorists whilst entering the three parking areas. The design of the proposed signs is considered to be suitable and will allow the signage to be read in poor light conditions. In respect of the proposed content on the signs this is not for consideration under this application.

In respect of lighting, the application does not propose any illumination. Given the site is located within a sensitive area, it is not considered appropriate for any illumination to be provided at any time. Therefore, a condition will be imposed to ensure no illumination is provided to the signs.

Having regard to the design and locations of the proposed signage it is considered that the application for 12 month temporary advertisement consent is acceptable in terms of impact upon amenity.

Impact on Highway Safety:

TAN 7 also states that Local Planning Authorities should have regard to an advertisement's effect upon the safe use and operation of traffic and transport, including the safety of pedestrians when assessing its impact on public safety.

The location of the proposed signage does not affect any part of the existing B4319 road which extends through Freshwater West and provides access to all three parking areas. The signs are considered to be in locations which will maintain the access visibility when entering and leaving all three parking areas whilst also not being considered to be a distraction to passing traffic. The Highways Authority has assessed the scheme and considers it to be acceptable in terms of highway safety.

Other Matters – Biodiversity:

The North car park forms part of a large sand dune system and beach which is designated as a Special Site of Scientific interest (SSSI), Special Area of Conservation (SAC) and Special Protection Area (SPA). The Main car park and Quarry car park are both located adjacent to these designated areas. Natural Resources Wales (NRW) and the Authority's Ecologist have been consulted and no objections have been raised on the current scheme.

The Ecologist is requesting that an informative be added to any consent granted to ensure that in the event that any protected species are discovered during the course of the development, works cease and NRW are contacted for advice. As the site forms part of a SSSI, Section 28G of the Wildlife and Countryside Act is relevant. The local planning authority is subject to the duty to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest. The granting of advertisement consent, subject to an informative, would be in accordance with this duty

Conclusion

Notwithstanding the objections received, following consideration of the policies contained within the Local Development Plan, National Planning Policy in the form of Planning Policy Wales (Edition 10, December 2018), Technical Advice Note 7 and having regard to relevant material considerations it is considered that the development will be in keeping with the aims of the LDP in that the development is considered to retain the special qualities of this area of the National Park whilst also not raising any highway safety concerns. As such, and subject to a schedule of suitable conditions, the development is considered to be acceptable and complies with the requirements of policies 1, 7, 8, 9, 10, 11, 15, 29, 30, 35 and 53 of the adopted Local Development Plan.

Recommendation

Approve subject to appropriate conditions

1. The advertisement signage and any associated fittings shall be removed from the site in its entirety no later than 12 months from the date of this decision.
Reason: In the interest of conserving the amenities and character of the area.
Policy: Local Development Plan – Policies 1 (National Park Purpose and Duty) and 15 (Conservation of the Pembrokeshire Coast National Park).
2. The development shall be carried out in accordance with the following approved plans and documents: Drawing Reference: North Car Park Location Plan (Received 28.05.2019)
Drawing Reference: Main Car Park Location Plan (Received 28.05.2019)
Drawing Reference: Quarry Car Park Location Plan (Received 15.07.2019)

Drawing Reference: ADPL: 001/1 (Received 15.07.2019)

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. There shall be no illumination of any signage, either internally or externally, in any form.

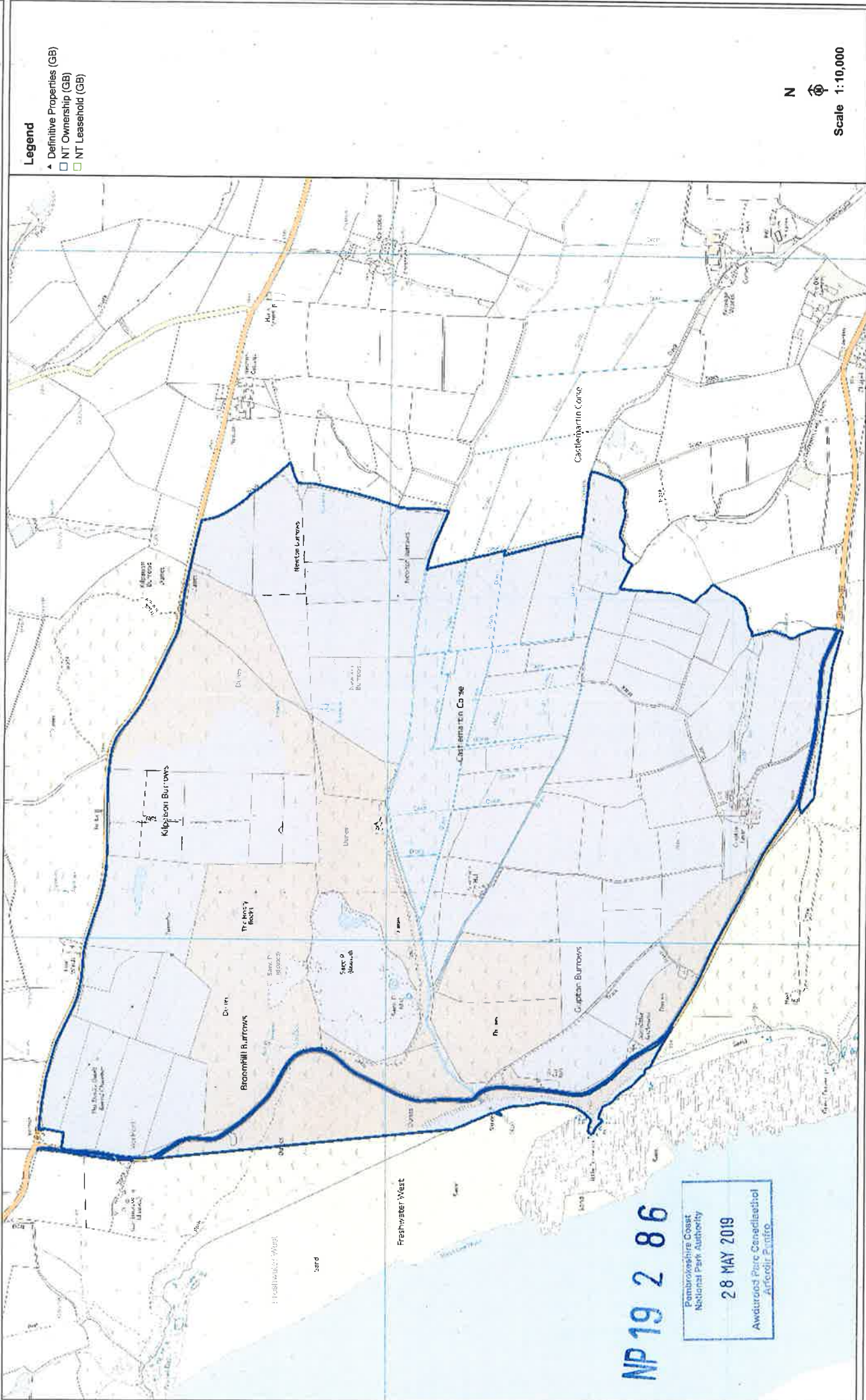
Reason: In the interest of conserving the amenities and character of the area. Policy: Local Development Plan – Policies 1 (National Park Purpose and Duty) and 15 (Conservation of the Pembrokeshire Coast National Park).

4. The existing signage clearly identified on Drawing Reference: ADPL: 001/1 (Received 15.07.2019) shall be removed from site within 2 months from the date of this consent and not replaced at any time.

Reason: To preserve the character of the area and to reduce the cumulative effect on visual clutter and therefore preserving 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 30 (Amenity).



Stackpole Estate Land Ownership: Fresh Water West



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- ▤ NT Leasehold (GB)



Scale 1:10,000

NP 19 2 86

Pembrokeshire Coast
National Park Authority
28 MAY 2019
Awdurdod Parc Cenedlaethol
Arfordir Penfro

0.50 0 0.25 0.50 Kilometers

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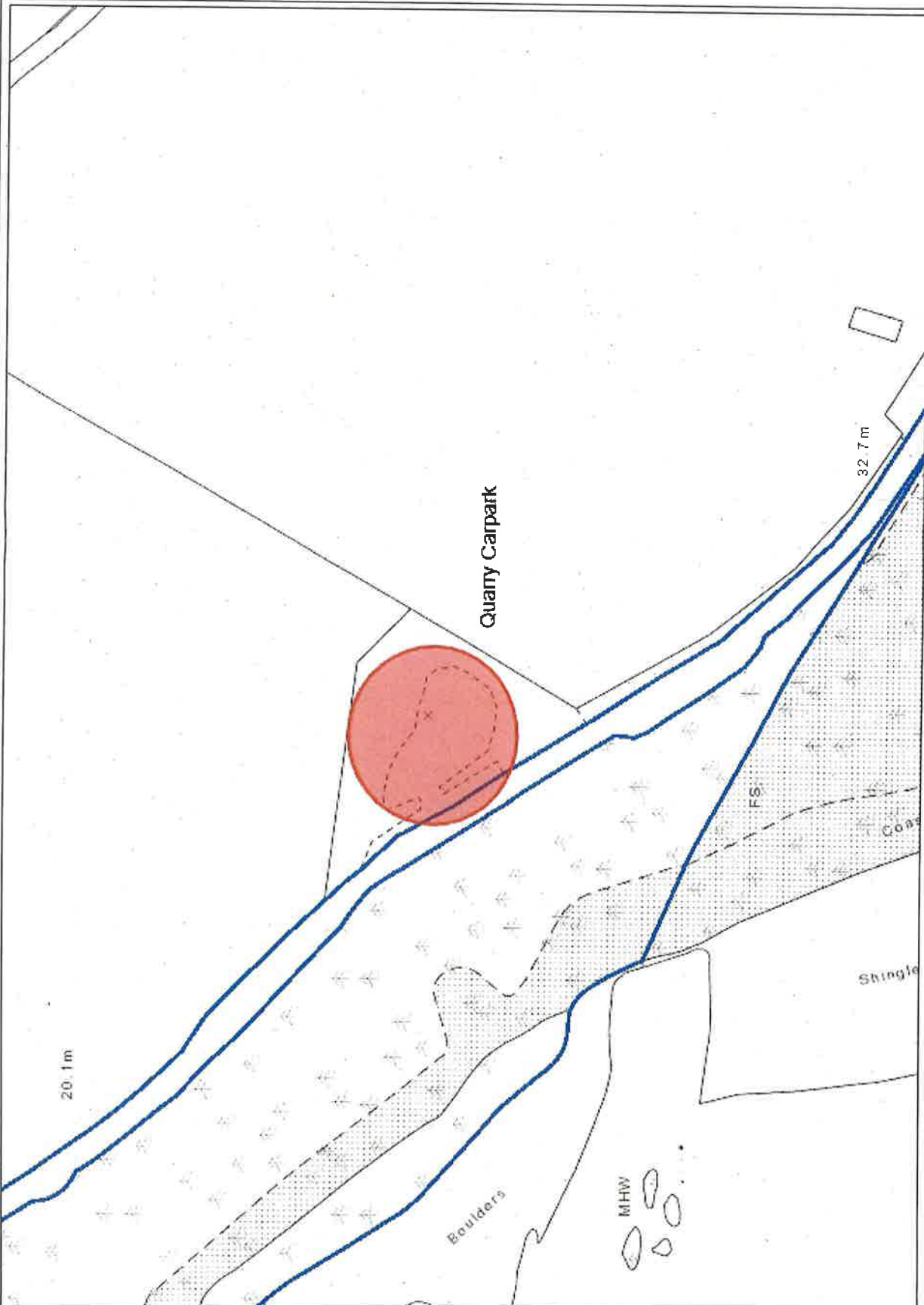
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Notes
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Car Park Enforcement: Quarry Car Park Location Plan



Legend

- NT Ownership (GB)
- NT Leasehold (GB)
- OSMMArea_NatEnv
- OSMMArea_Landform
- OSMMArea_Building
- OSMMLine_Poly
- OSMMLine_Boundaries
- OSMMPnt
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NP 19 2 86

Pembrokeshire Coast
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1: 1,250

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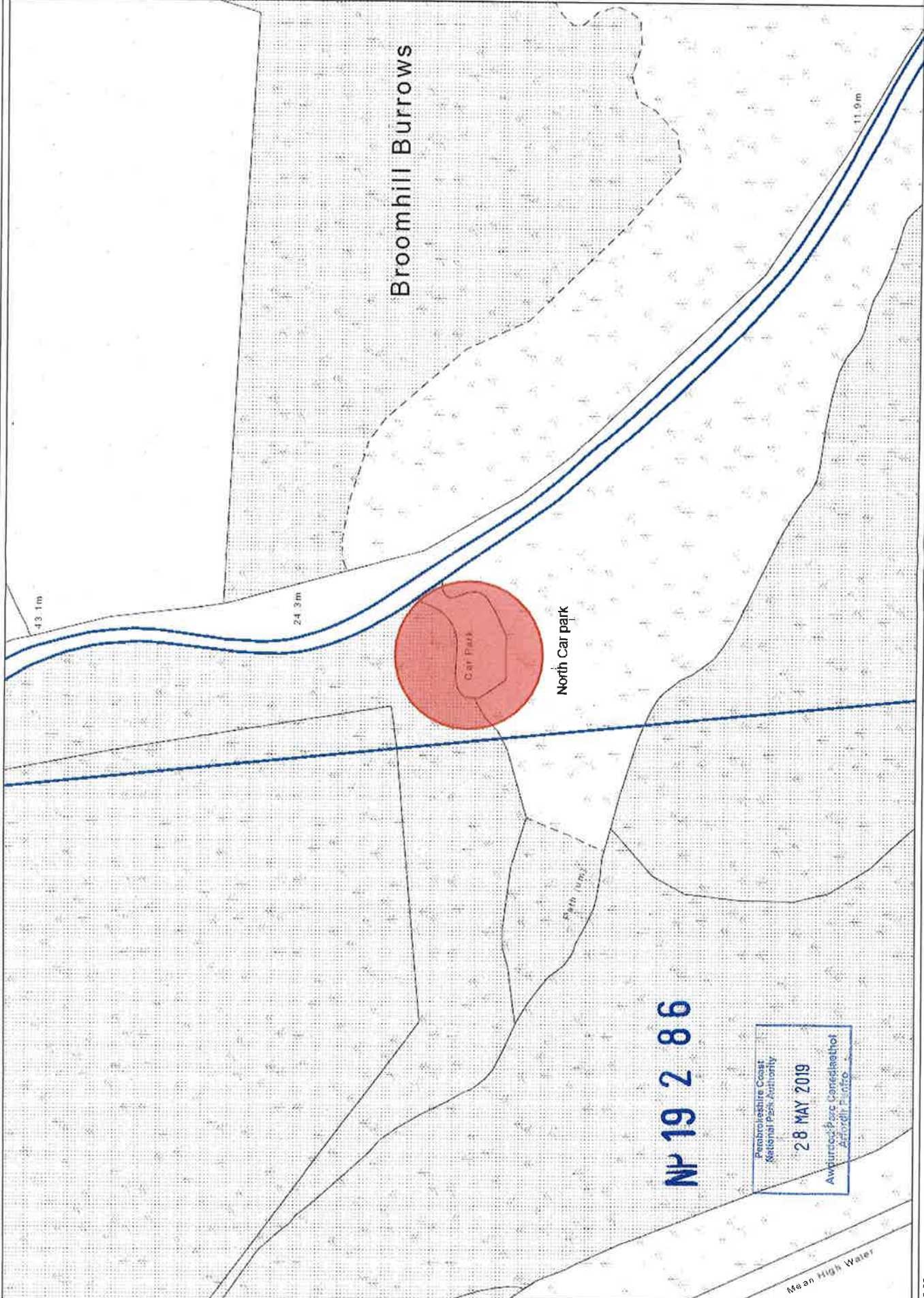
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0.1
0.03
0
0.1 Kilometers

British_National_Grid
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Car Park Enforcement: North Car Park Location Plan



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)
- OSMMArea_AirEnv
- OSMMArea_Landform
- OSMMArea_Building
- OSMMLine_Poly
- OSMMLine_Boundaries
- OSMMPnt
- OSMMSym

N
Scale 1:1,250

Notes

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NP 19 2 86

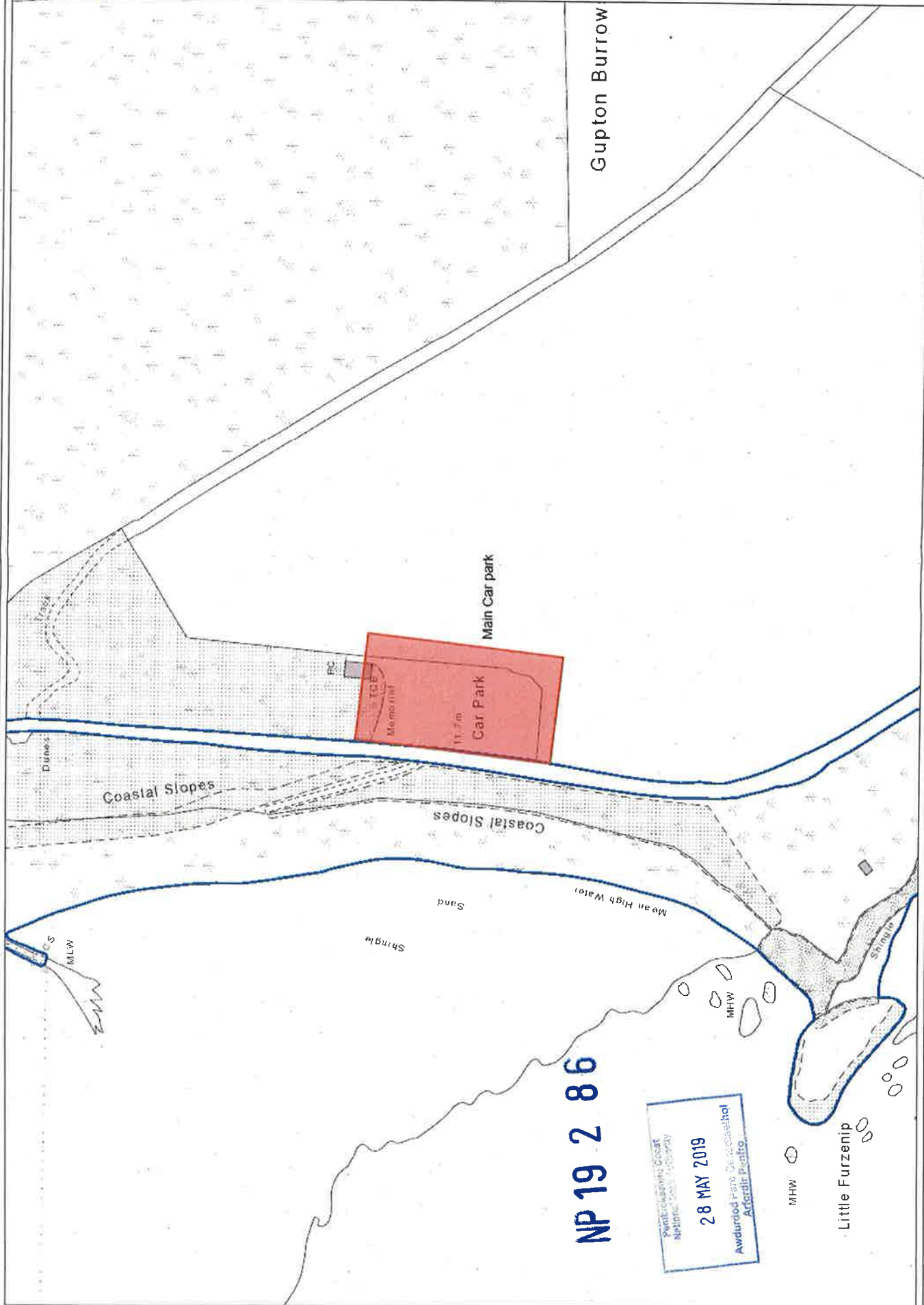
Pembrokeshire Coast
National Park Authority
28 MAY 2019
Awdurdod Parc Cenedlaethol
Arfordir Peninsle

0.06 0 0.03 0.06 Kilometers

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Car Park Enforcement: Main Car Park Location Plan



Legend

- ▲ Definitive Properties (GB)
- NT Ownership (GB)
- NT Leasehold (GB)
- OSMMArea_NatEnv
- OSMMArea_Landform
- OSMMArea_Building
- OSMMLine_Poly
- OSMMLine_Boundaries
- OSMMPnt
- OSMMSym

N



Scale 1:1,250

NP 19 2 86

Parish Councils Coast
National Park Authority
28 MAY 2019
Awdurdod Parc Deuddiasthol
Arferddi Parhys



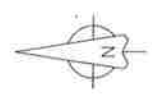
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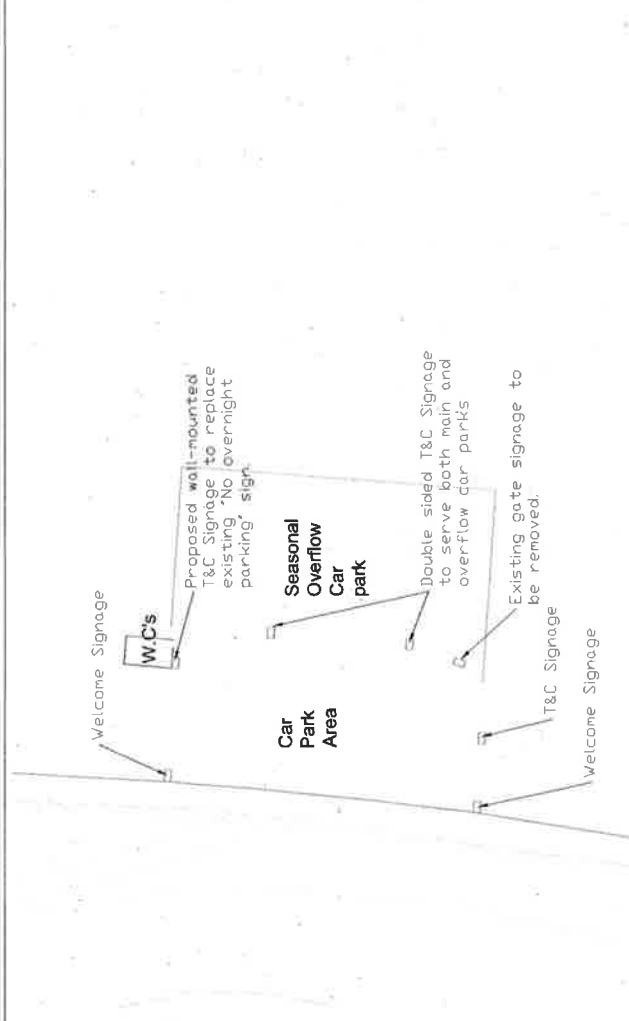
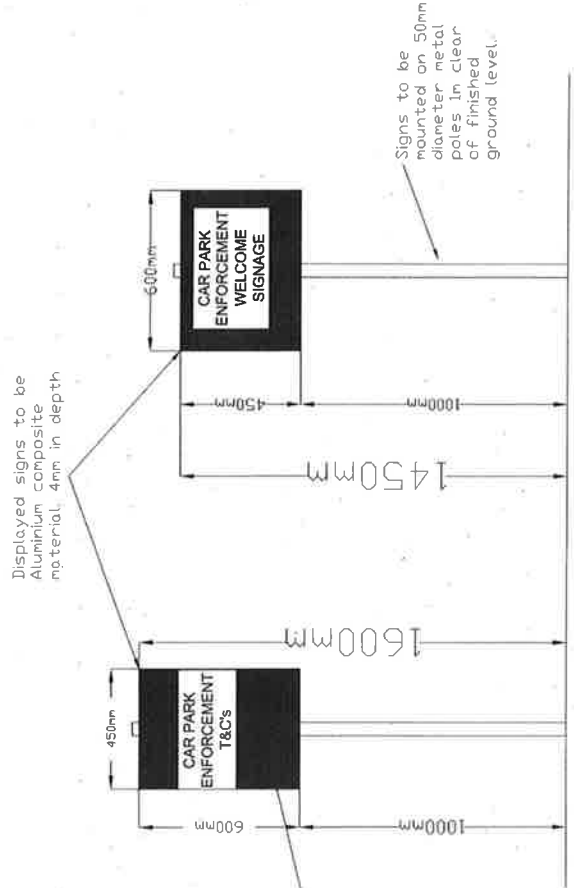
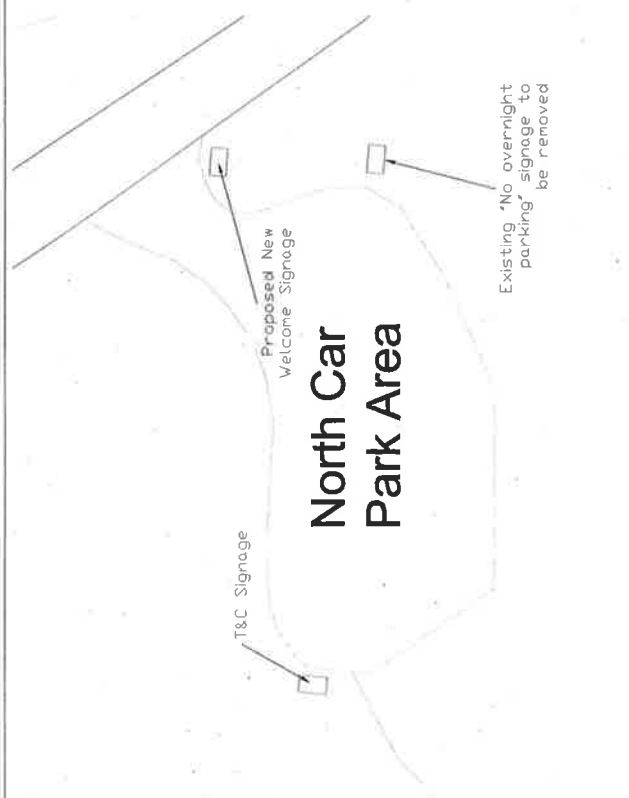
Revision	No.	Date	Drawn	Checked
1	ADD	14.01.19	Updated permission to include existing signage	

MP 19 2 86



National Trust
 WILLES REAGON
 100, High Street
 The Grange
 Oakley Home Farm
 SAKESBURY
 Telephone 01589 628101

Project Name: Freshwater West Car Parks
 Advertisement Consent
 Date: 23.05.19
 As shown: []
 Drawing to: ADP1: 001



Proposed Enforcement Signage
 Scale 1:10

Quarry Car Park Proposal
 Scale 1:200