Application Ref: NP/18/0335/FUL

Case Officer  Andrew Richards
Applicant     Mr M Whitehouse
Agent         Mr G Blain, Gerald Blain Ltd
Proposal      Alterations to provide new access to the site, increase site area & change existing 50 static caravans, 20 touring caravans and 30 tents into 91 lodge-style static caravans, new shop & reception area, new tractor shed, sales/display area for 2 units, staff & visitor parking area, new restaurant, areas for LPG storage and electricity transformer, minor alterations to existing road layout together with provision of new access roads within the site and associated external works

Site Location  Fishguard Bay Camping & Caravan Park, Fishguard, Pembrokeshire, SA65 9ET
Grid Ref       SM98323830
Date Valid     13-Sep-2018    Target Date    20-Mar-2019

This application had been considered by the Committee at its December meeting when it had been resolved that consideration of the application be deferred and the site inspected by the Committee. The site inspection was carried out on the 4th February 2019 and is before members for consideration.

Consultee Response

Dinas Cross Community Council: Support
PCNPA Tree and Landscape Officer: Conditional consent
PCNPA Planning Ecologist: Concerns raised
PCNPA Park Direction: Policy refusal
PCNPA Estates Officer: No adverse comments
PCNPA Access Manager: Conditional consent
PCC Transportation and Environment: Conditional consent and financial contribution required for upgrading of highway
PCC Public Protection: No adverse comments
PCC Drainage Engineers: Conditional consent and add informative
PCC Access Officer: Informative to be added
Natural Resources Wales: Concerns raised
Dwr Cymru Welsh Water: No comment and add informative
South Wales Trunk Road Agency: No objection
National Trust: Concerns raised

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.

A letter of support has been received from the local councillor.
Several letters of correspondence have been received which raise the following concerns/objections:

- Landscape impact
- LDP Policies 8 (Special Qualities) and 15 (Conservation of the Pembrokeshire Coast National Park)
- Loss of tent site and touring caravan pitches
- Transport impact
- Loss of flora and fauna

The above issues have been considered in the main report below.

**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](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 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 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 03 - Making and Enforcing Planning Decisions
PPW9 Chapter 04 - Planning for Sustainability
PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW9 Chapter 07 - Economic Development
PPW9 Chapter 08 - Transport
PPW9 Chapter 11 - Tourism, Sport and Recreation
PPW9 Chapter 12 - Infrastructure and Services
Officer’s Appraisal

Planning approval is sought for alterations to provide a new access to the site, increase site area & change existing 50 static caravans, 20 touring caravans and 30 tents into 91 lodge-style static caravans. In addition the proposal includes a new shop and reception area, new tractor shed, sales/display area for 2 units, staff & visitor parking area, new restaurant, areas for LPG storage and electricity transformer, minor alterations to existing road layouts, together with provision of new access roads within the extended site area and associated external works.

Key Issues

The application raises the following planning matters:-
Policy, Visual Amenity and Special Qualities of the National Park:

One consultation response letter refers to the development not being in accordance with LDP policies 8 (Special Qualities) and 15 (Conservation of the Pembrokeshire Coast National Park).

The proposal seeks to replace the permitted 50 static caravans, 20 touring caravans and 30 tent pitches into 91 lodge-style static caravan units and to increase the site area by some 67% into adjacent agricultural land which also forms part of the prominent coastal slope.

Policy 38 of the Local Development Plan seeks to retain the status quo in terms of caravan and camping provision. Exceptionally site areas may be enlarged where this would help to achieve environmental improvement. Unrelated improvements such as providing additional facilities or upgrading caravan provision will not be expected. Any increases in site size would be to achieve environmental enhancement through reducing density or allowing for additional landscaping. The policy is clear that an increase in the number of pitches will not be permitted.

The site is in a prominent and exposed location. The Authority has adopted Supplementary Planning Guidance on Landscape Character and the site is located within character area 24. The area is described as being a settled, peaceful landscape (except for the main road) and dominated by pastoral agriculture fields. A distinct sense of place is derived from the extensive coastal views. It is noted that agricultural changes such as increased field sizes and the introduction of non-traditional farm buildings are impacting negatively on the landscape. It is advised that the siting, layout and construction materials of future development should be in keeping with the existing character of traditional built-form.

The Authority also has a complementary Supplementary Planning Guidance document on Seascape Character. The site is within Character Area 6. The existing Fishguard Bay Caravan Site (Penrhyn) is cited in the document as a prominent feature on the coastal edge.

It is described as:
“a prominent detractor to the feeling of remoteness and naturalness.”

The document identifies that development pressures will impact on the coastal splendour, remoteness, tranquillity and wilderness and the space to breathe in this Character Area.
Policy 1 of the Local Development Plan is based on National Park Purposes and sets out that development in the National Park must be compatible with conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park – and the public understanding and enjoyment of those qualities. When considering applications the Authority has a duty to consider the economic and social well-being of communities provided it is compatible with the statutory National Park purposes.

Policy 8 of the Local Development Plan is intended to protect the Special Qualities of the National Park – including the sense of remoteness and tranquillity and development of the undeveloped coast.

Policy 15 of the Plan protects the qualities and special character of the National Park by resisting development that would:

a) Cause significant visual intrusion  
b) Be insensitively or unsympathetically sited within the landscape  
c) Intensify a use incompatible with its location  
d) Fail to harmonise with or enhance the landform and landscape character of the National Park.

The prominent location of the existing caravan site within the landscape is already noted. The proposals would create an even greater significant visual impact and would extend development along the undeveloped coast. It must be acknowledged that the Pembrokeshire Coast National Park is the only National Park in the UK to be designated primarily for its coastal landscape. The intensification of the use of both the existing site and the site extension through the additional permanent static caravan units would be contrary to the above policies seeking to control such developments. Furthermore the need to protect the undeveloped coast is fortified in Planning Policy Wales (Edition 10, December 2018) (para 6.5.9). There are therefore significant policy objections to the principle of extending this prominent site.

In preparation for the Local Development Plan Review, the Authority commissioned a study to consider the capacity of the National Park landscape to absorb camping and caravanning developments. The study was based on the Landscape Character Assessment areas. This report acknowledges that further development in Landscape Character Area 24 in more open or exposed sites would affect the mainly unspoilt and undeveloped character of the coast. New sites should not be inter-visible from the sea and coast. It also identifies that there are no situations where there may be a benefit in extending sites without an increase in accommodation – let alone including an increase in accommodation. The mitigation guidance to the Authority within the report includes removing static caravans from prominent locations and at the coast.

The proposal includes some additional landscape detail. However, in an exposed location such as this, with plants exposed to salt-laden winds on an exposed landscape, there is little opportunity for effective mitigation. On the coastal slopes the landscaping can also add to the detraction as it combines with the development to present an unnatural and developed feature within a wider undeveloped landscape. Thus the proposed landscaping and ecological enhancement would not be sufficient
in this instance to overcome the significant policy objections to the principle of extending this prominent site.

Policy 9 of the Plan relates to light pollution. The agent has advised that a ‘light curfew’ would be imposed at night between 2300 and 0400. Whilst this may be controllable for external lighting, it would not be possible to enforce such a condition for the internal lighting within the lodge style static caravans. The scale of the proposal has the potential to significantly increase the level of light pollution to the detriment of the special qualities of the National Park and would be contrary to this policy.

The tourism impact assessment makes reference to staffing and job creation, suggesting a 381% increase in the number of full-time equivalent posts. Planning Policy Wales requires the planning system to support economic and employment growth but alongside social and environmental considerations and within the context of sustainable development.

Authorities are required to ensure that the economic benefits of proposals are understood and also given consideration along with social and environmental issues in the decision-making process. In rural areas the expansion of existing businesses located in the open countryside should be supported where there are no unacceptable impacts on local amenity.

In this instance the impacts of the proposal on the National Park landscape and its special qualities are significant and the creation of 21 additional full-time equivalent posts is insufficient to outweigh the identified concerns which cannot be mitigated in this location.

The Sandford Principle states that the first purpose of National Parks is the preservation and enhancement of natural beauty. The second purpose is the promotion of public enjoyment. Where there is conflict between the two purposes priority must be given to the preservation and enhancement of natural beauty.

The location of the site in the countryside would also generate additional trips for employees living in nearby settlements. The nearest bus service operates along the A487. The single track road to the site from its junction with the A487 is 1.12km and therefore in excess of the 1km maximum distance the Authority considers reasonable as a walking distance to facilities and services – as set out in the adopted Accessibility Supplementary Planning Guidance. The access road from the A487 is unlit and the location exposed. It is also a single track road with no footway and there is therefore substantial potential for vehicle and pedestrian conflict. The distance and these characteristics make this a very unattractive walking route.

The majority of the new jobs cited in the supporting documentation to the application are in the hospitality element and thus has potential for working during hours of darkness. It is therefore highly likely that the only reasonable means of reaching the site would be by car. This is contrary to the Welsh Government’s main sustainability objectives which are to reduce car use.

Amenity and Privacy:
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 development which would generate some increase in the amount of noise from current levels. The noise associated with the new development would be year round. However, this noise would be similar to residential noise and is not considered to generate an unacceptable level of noise in this instance.

Pembrokeshire County Council Public Protection section has indicated that the current proposal would not generate significant impact on amenity for local residential properties and therefore did not raise concerns for this application.

The application site has a residential dwelling located immediately to the south east. Hedge banks and trees are located between the application site and the nearby residential property. In respect of privacy, given the distance between the site and the nearby residential property and the partial screening provided by the existing landscaping and buildings, the proposed development would not give rise to any unacceptable concerns in respect of privacy.

Highway Safety and Access:

One consultation response letter refers to concerns on transport impact from the development.

Pembrokeshire County Council Transportation and Environment section indicate that there is no objection from the Highway Authority to the principle of the new access, and no objection to the layout of the on-site roads, the location of the new buildings, or the proposed static caravan plots. A detailed plan of the access is required as a pre-commencement condition, and the access crossing of the Highway verge needs to be licensed by the County Highway Authority Street care section and a note will be added to any consent granted to cover this aspect.

There is concern about the condition of the Unclassified Road (U3425 Penrhyn Road) leading to the site. The site entrance will still be 950 metres from the junction with the Trunk Road A487, even though the last 170 metres past the group of dwellings at Penrhyn will be bypassed, and over this distance there is already deterioration of the surfacing of the verges, and also to the edges of the carriageway, where vehicles pass one another. There is a need to upgrade rough stone and muddy passing areas before any part of the new development is open for business.

There would be a need for a Road Condition Survey to ensure any damage caused by the development can be specifically attributed to the construction period for the new development. Due to the future traffic increase additional works would need to be carried out to upgrade the surfacing on the passing places along the Unclassified Road. There would be a significant number of heavy goods vehicles bringing in the large static caravans and lodges during the early months and years of operation.
Should the units be occupied there will be an incremental increase in day-to-day movement of cars, based upon the increase in pitch numbers. The removal of the touring caravans visiting the touring pitches would not mean a reduction in towed vehicles, as there could be a similar number of towed boats on trailers. As such, the proposed development is considered to have the potential to increase the overall traffic movements into and from the site.

Therefore, subject to the cost of the repairs, this is £10,000 as a transportation contribution under the terms of an associated Section 106 Planning Agreement to current proposal would be considered to be acceptable and subject to planning conditions relating to details of the new access, highway condition survey and appropriate repair.

However, no completed legal agreement has been submitted to date and this would form a reason for refusal.

South Wales Trunk Road Agency (SWTRA) has indicated that in order for them to consider the potential impacts of the proposed development at the junction with the A487 Trunk Road a Traffic Statement is required. The Welsh Government therefore directs that no consent is granted until this information has been formally considered and approved. This statement has now been received and SWTRA together with Pembrokeshire County Council Transportation and Environment section has been re-consulted and the authority is currently waiting for the consultation responses.

**Landscaping:**

The existing site has a mixture of mature trees and traditional Pembrokeshire hedgebanks along its boundary which would be retained as part of the proposed scheme. The proposal also seeks to retain areas of soft landscaping within the existing site and provide additional landscaping on this site and the new site areas in the form of new hedgerows, hedging, scrub and tree planting to assist in providing partial screening from the wider landscape.

However, given the nature of the existing sparse landscape at this location along this stretch of coastal slope, it is considered that the new planting proposed in this instance would add a harmful landscape feature which would result in a significant adverse change to the coastal splendour, remoteness, tranquillity and wilderness of this stretch of coastline.

As such, whilst the new landscaping would assist in general terms for partial screening of the new site and the new structures proposed, views into the site from the wider landscape and seascape taking account of the new landscaped areas in combination with the small copse of tress located to the south east of the site would result in this small area becoming heavily landscaped. This proposed landscaping would when compared to the existing sparsely landscaped coastal slope that is flanked by craggy outcrops be considered to be adding landscaping features into an area which will result in a significant landscape character change to the detriment of this area of the National Park.
Therefore, whilst the application proposes approximately 200 new trees and additional soft landscaping features throughout the existing and new site areas, the existing landscape character is not considered in this instance to be able to accommodate this proposed development together with its associated landscaping.

**Biodiversity:**

One consultation response letter refers to concerns on the development resulting in the loss of flora and fauna.

PPW, TAN5 and LDP policy 11 requires biodiversity and landscape considerations to be taken into account in determining individual applications.

The site for the proposed development extension which are currently three separate fields are of high ecological value and have previously been managed as three different habitats; a fine example of species-rich grassland/hay meadow in the northern field, previously rhos pasture in the eastern field and steep bracken-dominated slopes in the western field. There is a concern that the proposed development would result in the loss of these valuable habitats if the development is not undertaken sensitively. The proposed development in its current form would make conservation management very difficult and it is likely these valuable habitats would be lost.

The historic management of these fields ceased some 4-5 years previous. The ecologist acknowledges that the northern field would improve under the correct management regime and that any bramble/bracken encroachment could be rectified. It is noted that the field still offers potential as good quality habitat and with the correct management this site could return to being flower-rich, rich in invertebrate life and offer good quality pollinator habitat. The same is applicable to the eastern field, which since the historic management has ceased has lost much of its value as rhos pasture.

Although the quality of the fields has declined recently the ecologist considers that it could be returned to high value, good quality and important habitat for invertebrate and pollinators. This was a rare example of flower rich and rhos pasture and the current proposed development would result in the loss of areas of high value.

An updated ecological report covering the three fields has been received. This site was a rare example of flower rich and rhos pasture and the proposed development would result in the permanent loss of areas of high value. However, the Authority’s Ecologist confirms that parts of the site could improve considerably and be returned to areas of high ecological value the under the correct management regime.

New development will need to restore or wherever possible enhance the National Park’s ecosystems. Policy 10 of the LDP states that development that would be liable to significantly harm the nature conservation value of a local nature reserve or other sites of local nature conservation interest, or the main features of interest within a regionally important geodiversity site, will only be permitted if the importance of the development outweighs the local value of the site and mitigation, minimisation or offset setting has been investigated.
The current application is not considered to outweigh the local habitat value and the mitigation proposed on the scheme is also not considered to restore or enhance the nature conservation value of this site within the National Park. Therefore, the current proposal is considered to be liable to significantly harm the nature conservation value of the site and is contrary to LDP Policy 10 (Local Sites of Nature Conservation or Geological Interest) which forms a reason for refusal.

**Land Drainage and Flooding:**

Pembrokeshire County Council Drainage Engineers have been consulted as part of the application and support the application subject to the discharge of surface water from the new structures being directed to new soakaways or other form of sustainable drainage system. If, however, ground conditions are not suitable for the use of soakaways/infiltration type SuDS, an alternative method of disposal will be required, which should be agreed in writing with the local planning authority.

It is also noted that any surface water runoff from impermeable surfaces created as part of the development should be disposed of to soakaways or other forms of SuDS.

Ordinance survey mapping indicates the presence of ordinary watercourses within the perimeter of the site. Ordinary watercourses should not be filled in, culverted, or the flow impeded in any manner, without approval. In addition any existing watercourses, drains, ditches and outfalls which are disturbed by the proposals should be suitably intercepted and redirected, to ensure that the existing local drainage network is not adversely affected. An informative would cover this aspect.

**Other Material Considerations:**

National Trust has raised concerns that the proposal does not include a Landscape Visual Assessment, the proposed levels may result in significant earth works on the site and the proposal will result in the loss of undeveloped coastal slopes which will result in impact on the adjacent National Trust land. The landscape impact concerns raised by NRW are similar. These concerns are addressed in the report above.

Additional information in the form of a Landscape and Visual Statement relating to the landscape impact from the proposal is considered to address some of the missing information previously requested but it is noted that there are still some viewpoints missing which would need to be taken account of as part of any landscape impact assessment. Notwithstanding the lack of viewpoints the landscape impact of the proposed development is considered to be harmful to the special qualities of the national park and to both the immediate landscape and seascape.

Dinas Cross Community Council supports the proposal and considers that the improvements would benefit the economic and social economy of the area. They also consider the development would enhance the special characteristic of the National Park.
One consultation response letter refers to the loss of tent and touring caravan pitch provision resulting from the proposed move over to static caravan style pitches throughout this site. It is noted that there are many sites within the National Park that only offer one specific provision of unit pitch type within their sites. The LDP does not specifically relate to this aspect directly and is difficult to suggest that this is a material consideration of significant weight. In this instance the proposed change will result in adverse visual, landscape, transport and biodiversity impacts that are of much greater weight than any concerns raised on the loss of different pitch options within the site.

Pembrokeshire County Council Public Protection section has also been consulted and no response has been received to date. A further verbal report will be given to members on this aspect.

Conclusion

Notwithstanding the additional information received and the outstanding consultations as indicated above there remain significant national and local policy objections to this application which are not off-set by the proposed landscaping and environmental mitigation, which would in its own right be a significant detractor in the landscape. The impact on the National Park landscape and its special qualities are significant and increasing the level of landscaping is likely to do little but increase the visual impact in this exposed location. The economic benefits have been taken into account but do not counter the overall environmental objections to this proposal.

Recommendation

REFUSE, for the following reasons:

1. Policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan state extension to existing holiday sites will not be permitted in the National Park. The additional 41 lodge-style static caravans and their associated development in an open countryside location is therefore contrary to adopted Local Development Plan Policy.

2. Policies 1, 8, 9, 15, and 30 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 fails to incorporate traditional features, and 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, 9, 15 and 30 of the adopted Local Development Plan Policy and Supplementary Planning Guidance on Landscape Character Assessment and Seascape Character Assessment.

3. Insufficient information has been submitted in respect of highway repairs and improvements in the form of a legal agreement to allow the local planning authority to properly mitigate against the impact of the development on
highway and pedestrian safety. The application is therefore contrary to Policy 53 of the Pembrokeshire Coast National Park adopted Local Development Plan (2010).

4. Policy 10 of the Pembrokeshire Coast National Park Local Development Plan seeks to protect nature conservation values of a local nature reserve or other sites of local nature conservation interest, or the main features of interest within a regionally important geodiversity site, development will only be permitted if the importance of the development outweighs the local value of the site and mitigation, minimisation or of off-setting has been investigated. The proposed development is not considered to outweigh the local habitat value and the mitigation proposed on the scheme is also not considered to restore or enhance the nature conservation value of this site within the National Park. Therefore, the current proposal is considered to be liable to significantly harm the nature conservation value of the site and is contrary to Local Development Plan Policy 10 (Local Sites of Nature Conservation or Geological Interest).
Lodge Materials

Roof: Onduline (or equivalent) / dark gray
Eaves: UPVC / natural timber effect
Walls: Timber clad effect / natural color
Windows: UPVC / natural timber effect
Doors: UPVC / natural timber effect
Gutter: UPVC / black
Down pipe: UPVC / black

Plan

front elevation

Rear elevation

Side elevation

Side elevation

0 5m

Job: New Site layout at 1 Fishguard Bay Holiday Park,
FISHGUARD, SA65 9JH.

Dwg. Title: Lodge plans - Lodge Example Twin Unit (2 bed)

Drawing Number: 12

Drawn By: Chris Sanders

Checked By:

Client: Mr Mark Whitehouse

Date: 12/2017

Scale: 1/100 A3
Lodge Materials

- **Roof**: Onduline (or equivalent) / dark gray
- **Eaves**: UPVC / natural timber effect
- **Walls**: Timber clad effect / natural colour
- **Windows**: UPVC / natural timber effect
- **Doors**: UPVC / natural timber effect
- **Gutter**: UPVC / black
- **Down pipe**: UPVC / black

**Plan**

**front elevation**

**Rear elevation**

**Side elevation**

**0** — **5m**

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**Job:** New Site layout at 1 Fishguard Bay Holiday Park, FISHGUARD, SA65 9JH.

**Dwg. Title:** Lodge plans - Lodge Example Twin Unit (2 Bed)

**Drawing Number:** 13

**Drawn By:** Chris Sanders

**Client:** Mr Mark Whitehouse

**Checked By:**

**Date:** 12/2017

**Scale:** 1/100 A3
Lodge Materials

- **Roof**: Onduline (or equivalent) /dark gray
- **Eaves**: UPVC / natural timber effect
- **Walls**: Timber clad effect / natural colour
- **Windows**: UPVC / natural timber effect
- **Doors**: UPVC / natural timber effect
- **Gutter**: UPVC / black
- **Down pipe**: UPVC / black

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Job:
New Site layout at Fishguard Bay Holiday Park,
FISHGUARD, SA65 9JH.

**Drawing Number**: 14
**Date**: 12/2017
**Drawing By**: Chris Sanders
**Client**: Mr Mark Whitehouse
**Scale**: 1/100 A3
External Finishes
Horizontal FXL log panelling to walls - Colour TBC
Samafill single ply membrane roof covering - Colour TBC
Aluminium clad powder coated windows and doors in Anthracite grey
Timber fascia & barge boards - Colour TBC
Single skin steel box profile (colour coated green) with 6 no. rooflights

fair faced block work

West elevation

Single skin steel box profile (colour coated green) with 6 no. rooflights

fair faced block work

East elevation

12' x 12' opening

3'3"x7' door

North elevation

South elevation

Gerald Blaine Associates
Architectural & Planning Consultants
55 St Johns Street, Whitchurch, Caerphilly CF64 9AN
Tel: 011694 243608  Fax: 07970 439922

Job: New Site layout at Fishguard Bay Resort,
FISHGUARD, SA65 9ET.

Drawing Number: SB

Date: 12/2017

Checked By: CTS

Client: Mr Mark Whitehouse

Scale: 1/100 A3

0 5m