

# MAJOR APPLICATION PLANNING STATEMENT AND JUSTIFICATION REPORT

ENHANCEMENTS OF RYELANDS CARAVAN PARK WITH  
EXPANSION OF SITE AREA TO ACCOMMODATE THE APPROVED  
78 UNIT TOURING PITCHES WITH ALL YEAR ROUND HOLIDAY USE  
AND STORAGE WITH LANDSCAPE ENHANCEMENTS AND  
ADDITIONAL FACILITIES

**RYELANDS CARAVAN PARK, RYELANDS LANE, KILGETTY,  
PEMBROKESHIRE, SA68 0UY**

July 2018 (Pre-Application Consultation)



The Planning Studio, Hayston Bridge  
Johnston, Haverfordwest  
Pembrokeshire SA62 3HJ  
01437 891 817  
07515 851 704  
andrew@haystonplanning.co.uk  
www.planningpembrokeshire.co.uk

HAYS / 739

## Application for Planning Permission Town and Country Planning Act 1990

Head of Planning  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 ITP

HAYSTON DEVELOPMENTS & PLANNING LTD is making a full application on behalf of Mr Michael Ormond of Ryelands Caravan Park, Ryelands Lane, Kilgetty, Pembrokeshire, SA68 0UY for the following planning permission:-

- **Proposal:** Enhancements of Ryeland Caravans Park with expansion of site area to accommodate the approved 78 unit touring pitches with all year round holiday use and storage with landscape enhancements and additional facilities
- **Site location:** Ryelands Caravan Park, Ryelands Lane, Kilgetty, Pembrokeshire, SA68 0UY.
- **Type of Planning Permission:** Major Planning Application
- **Relevant Local Development Plan Policies:** SP1, SP5, GN1, GN2, GN18 and GN20.
- **National Planning Guidance:** Planning Policy Guidance Wales, Edition 9, November 2016, TAN 13 – Tourism (1997), Pembrokeshire Destination Management Plan (2013), Background Paper for Local Development Plan: Tourism Static and Touring Caravan and Camp Sites (May 2010)

### 1.0 INTRODUCTION

1.1 This is a major planning application for the enhancement and expansion of this existing caravan park to accommodate the approved 78 units. The application includes the erection of a new meet and greet building, new internal access roads, additional landscaping and children's play areas at Ryelands Caravan Park, Ryelands Lane, Kilgetty, Pembrokeshire.

1.2 Please find enclosed the following supporting information:-

- Copy of the planning application form and Certificate of Ownership
- **Drawing 01a** – Location and Block Plans at Scale A3 @ 1:5000 and 1:2500
- **Drawing 02b** – Proposed G.A. Site Plan at Scale A3 @ 1:1250
- **Drawing 03b** – Detailed New Site Plan at Scale A3 @ 1:500
- **Drawing 04d** – Meet and Greet Facility – Floor Plans at Scale A3 @ 1:100
- **Drawing 05e** – Meet and Greet Facility – Elevations at Scale A3 @ 1:100
- **Drawing 06** – Typical Treatment Plant Details at Scale A3 @ 1:50
- **Drawing 07** – Photo Montage - Sheet 1 – Not to scale
- **Drawing 08** – Photo Montage – Sheet 2 – Not to scale
- **Drawing 09** – Photo Montage – Sheet 3 – Not to scale

- **Drawing 10** – Photo Montage – Sheet 4 – Not to scale
- Planning Fee of **£380.00** (change of use of the eastern fields).
- **Appendix A** – Certificate of Lawfulness granted 25 May 2016 (15/1317/CL) for siting of 58 touring caravans during period between 1st March and 31st October.
- **Appendix B** – Extended Phase 1 Habitat Survey (Habitat Matters Ltd, March 2018) with landscaping and ecology enhancements.
- **Appendix C** – Design & Access Statement
- **Appendix D** – Pre-Application Consultation Report (PAC) – to be completed

1.3 This report is prepared in accordance with the requirements of Policies contained within the *Local Development Plan for Pembrokeshire* and incorporates *SPG Requirements for the Validation of Planning Applications (June 2010)* and *Welsh Government Development Management Manual (05<sup>th</sup> May 2017)*.

## 2.0 LOCATION AND BACKGROUND

2.1 Ryelands Caravan Park lies approximately 300m to the north of the settlement boundary of Kilgetty, approximately 1km from Kilgetty train station. The site is accessed from the south via the A477 onto Carmarthen Road and Ryelands Lane, and from the north via the A478 onto Ryelands Lane. The road at Ryelands Lane runs north/south roughly parallel to the railway line. Ryelands Lane narrows significantly as it emerges from the settlement in Kilgetty and becomes a single carriageway with passing places on the approach to the application site.



*Ryelands Lane Caravan Park (source – Google Aerial 2009)*

2.2 The caravan park itself consists of touring pitches, caravan storage areas, facilities block, amenity areas, a dwelling with workshop, and a static residential caravan. The site is surrounded by neighbouring fields. Ryelands Lane and the railway line are to the west of the site, the Miner's Path and woodlands at Fords Lake Valley are to the east. There are open fields to the north and fields with residential properties beyond on the edge of Kilgetty to the south. The site is bounded by existing mature hedgerows. A hedgerow also bisects the application site between the existing touring pitches and the seasonal camping / touring field. As a result of this existing screening and the limited height of touring caravans, the caravans are not easily visible from surrounding viewpoints.



*Aerial photograph with added annotations (Source: Skyscene Aerial Photograph Specialists, August 2014)*

2.3 Notwithstanding the narrow access road at Ryelands Lane, the caravan park is within 1km of the rural settlement (service centre) at Kilgetty, with its numerous amenities and services. Kilgetty's train station lies opposite the junction with Ryelands Lane and Carmarthen Road, and there are bus stops on Ryelands Lane and on Carmarthen Road. Near the junction with Ryelands Lane and Carmarthen Road there are also local retail and food outlets (including 2 small convenience stores, a pharmacy, a launderette, restaurants and takeaways).

### **3.0 PLANNING HISTORY**

3.1 The last permission granted on 5<sup>th</sup> May 2017 was for a Certificate of Lawfulness (COL) for the hybrid use (residential / holiday) of a static caravan for 10 years (Ref: 16/1228/CL). This static caravan is located to the north of the bungalow and separate from the touring site.



***Ryelands Lane Caravan Park with residential / holiday static caravan circled in red  
(source –Skyscene Aerial Photography 26<sup>th</sup> August 2014)***

3.2 Ryelands has been in use as a touring caravan park since the 1970s and has grown steadily since that time. While there is an extensive planning history at this site, the most recent and most relevant planning history is the Certificate of Lawfulness (CoL) granted in May 2016 (15/1317/CL). The CoL confirms that the site has permission, by virtue of the passage of time, for 58 touring pitches, since the site has operated for more than 10 years in breach of a Condition 02 of consent D3/201/85 and Appeal Decision P26/679. In addition to these 58 pitches, the site also has consent for the storage of 20 caravans throughout the year (D3/273/94). In total this provides for a maximum of 78 caravans on site at any one time. This number of caravans is confined to the western field (the existing touring pitch site) and there is currently no permission for touring pitches on the eastern field. The eastern field (1.9ha) is currently used periodically for rallies at which up to 10 campervans and tents are pitched on the field. In addition, the field is available for more informal recreational use associated with the caravan park and therefore not a virgin greenfield site.

3.3 In a number of previous decisions, which were related to increasing caravan numbers on the site, highways officers have raised concerns about the capacity of the local highways network. The particular highways concern is made clear in the one of the earliest cases, the 1976 decision (D3/94/76). The application was approved for 5 additional touring caravans, but was subject to provisions that any further increase would be resisted on the basis that *‘the approaches to this site are unsuitable for extensive use by touring caravan traffic’*. While the number of caravans allowed on the site were in the event increased to 35 (following the allowed appeal in 1990), the highways matter remained an ongoing concern for the LPA and was raised again in the reasons for refusal of the application to increase to 45 caravans in 1997 (97/0319/PA, refused 08 September 1997).



*Streetview image of Ryelands Lane (Source: Google Streetview, September 2011)*

3.4 The applicant does not dispute the concerns raised in relation to towing traffic and the access to the site along the narrow and restricted Ryelands Lane. However, the caravan park has not operated for at least 5 years on the basis of a regular turnover of caravans going to and from during the holiday season. Rather, the site operates on the basis of a consistent client base with the tourers remaining on site throughout the season. Indeed many touring caravan owners do not have a vehicle with a tow hook to transport their large caravan. Due to the size of modern touring caravans and the vehicles required to tow them, and indeed due to the narrow access road at Ryelands Lane, many caravans now remain on-site all year. Those that are taken off site are only removed during the winter season and returned to site in the spring. At present some tourers are taken off site to a storage area at Stepside where there is increased security over the winter. Around 5 tourers are towed to their owner's properties in other parts of Wales over the winter months and again are returned to the site in early spring. The highways concerns set out in point 3.2 above are therefore no longer a relevant ongoing concern because of the way in which caravan owners use the site. The site no longer draws significant numbers of towing vehicles along Ryelands Lane. Indeed, towing only takes place by virtue of the need to move caravans to suitable winter storage.



*Photograph from Drawing (Photo Montage) 08 showing existing area of storage on site*



*Photographs from Drawing (Photo Montage) 09 showing the site and the existing cramped layout / positions of the touring caravans*

3.5 This application will clearly reduce the number of vehicles and towing vehicles using Ryelands Lane. The number of caravans will be restricted to a maximum total of 78 across the whole site, in keeping with the current permissions on the western field. By spreading this number of caravans across the whole site this will remove the potential for traffic associated with rallies that have to date been held on the eastern field. In addition, the site will continue to operate a consistent client base of site users, leaving their caravans on site during the holiday season. Furthermore, the proposal will provide the increased security demanded by the client base, such that those who currently remove their caravans in the winter to a more secure location will no longer need to do so. As a result previous highways safety/congestion concerns have been overcome and shall be welcomed.

#### 4.0 PROPOSAL

4.1 The applicant and owner Mr Ormond, intends to improve the existing caravan park site through the relocation of a total of 78 touring pitches across the whole site area (i.e. including the field to the east which does not currently have touring pitches). Spreading the touring pitches over the whole site will provide a vastly improved layout with generous well planned pitch sizes, delineated pitches with planted boundaries between them, spacious surroundings, landscape planting, a pond, open space and children’s play area. Hedges are proposed between each pitch alongside the existing perimeter hedges, which are to be retained and maintained. There will be no separate provision of storage pitches on the site. As a result the total number of caravans on the whole site at any one time will not exceed the number already granted under 15/1317/CL and D3/273/94, which are permissions for the western field alone.

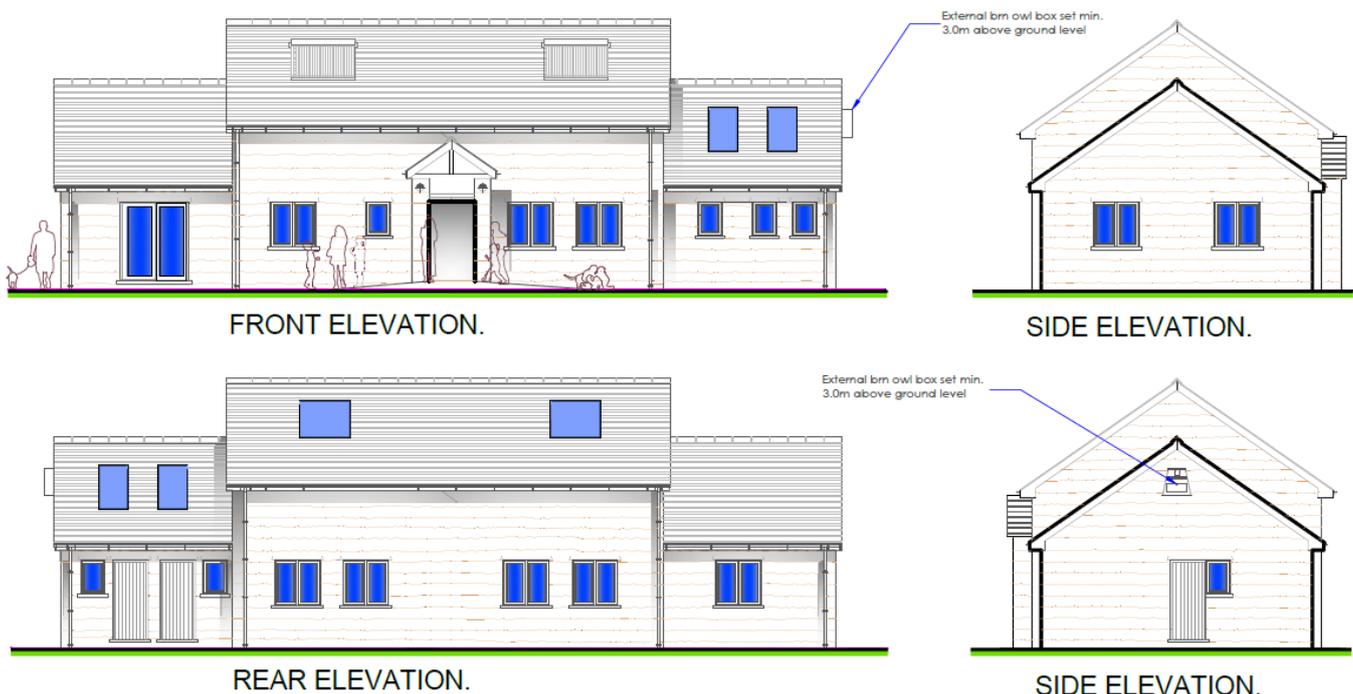


**Proposed G A Site Plan (Drawing 02b)**

4.2 Re-configuring the site to provide an improved layout of high quality touring pitches necessitates the extension of touring into the existing field to the east. This field, which is accessed via a gate in the dividing hedgerow, is currently used under an exemption under the Caravan Sites Act of 1960. The field is used for rallies with up to 10 units (tents or campervans) using the site at any one time. The proposal will provide 35 touring pitches on this extended part of the touring park, retaining a reduced number of 43 pitches on the existing western part of the site. The resultant layout is shown below and includes significant areas of open recreation space, a children’s play park and landscaped wildlife gardens. It is clear from the proposed layout that the intention is to create a holiday park that is visually attractive, well-planned and provides all the necessary facilities for holiday visitors. However, due to the limited facilities proposed the site will not result in reduced trips to use other local facilities such as shops, restaurants and other visitor attractions.

**4.3 Meet and greet building.** As part of the proposed improvements to the caravan park a new meet and greet building is proposed in the eastern field. This will include a new reception area, staff office, kitchen and W/C along with a games room, washroom area, 2 wet rooms and W/C facilities. Attic space is utilised in the roof void for a useful storage and plant room area. This sensitively designed single storey pitched roof building will include a slate roof and horizontal timber cladding to the walls. The windows, doors, fascia and gutters are to be golden oak in colour. The dimensions of this building will be 18.2m in length, a maximum of 7m in depth with a height to eaves level of 3.5m and a maximum ridge height of 6.4m.

This additional facility will supplement the existing toilet / shower facilities and provide a better quality facility and management building.



***Proposed Meet and Greet Building Elevations (Drawing No. 05e)***

**4.4 Landscaping and biodiversity enhancements.** Alongside the improved layout and due to the spreading of the pitches across the whole 4 hectare site there are significant landscape and biodiversity benefits from the scheme. Appendix B details the Extended Phase 1 Habitat Survey that was undertaken in March 2018 by Habitat Management Ltd which concluded *“It is considered that there will be no negative impact on the local or regional ecology through the development of the site. There are, in fact, considerable opportunities for positive amenity and biodiversity gain through the various enhancement measures that are included in the proposals.”* The advice of this report has been taken on board in further developing this proposal. The existing mature hedgerows will be retained and new landscape privacy hedges are proposed between each pitch. These will be formed of a 1m high planted bank and will encourage wildlife, provide screening to each pitch, as well as providing a visual and landscape benefit from views of the site. A number of open space areas are proposed in order to avoid overcrowding of the site layout.

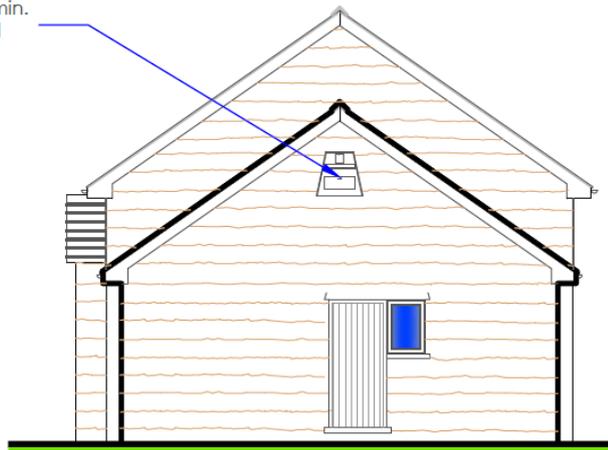
4.5 The biodiversity and landscape proposals include ‘open areas’ that ‘will be designed, planted and maintained in the long-term as a series of “wildlife gardens”, which can make a valuable contribution to increasing local biodiversity.’ Significant biodiversity benefits are also proposed in the formation of a new wildlife pond to the east of the site alongside a proposed woodland walk that connects the site to the existing Miner’s Walk Footpath, through a coppice of proposed trees. The retention and maintenance of all site boundary trees and hedges alongside the avoidance of such maintenance within the bird breeding season will protect existing flora and fauna. Bird and bat boxes can also be placed on the boundary trees to provide nesting and roosting opportunities. The Enhancement Proposal, which should be read alongside the landscaping set out in drawing No. 03b is included as Appendix 3 in the Extended Phase 1 Habitat Survey Report (Habitat Matters Ltd, March 2018) which is included as Appendix B.

4.6 Drawing 05e shows the location of the external barn owl box, as below:



FRONT ELEVATION.

External barn owl box set min.  
3.0m above ground level



SIDE ELEVATION.

*Scans from Drawing 02e showing the location of the external barn owl box on the proposed front and side elevation*

## 5.0 ACCESS & SERVICES

5.1 Access to the site for vehicles will continue to be via Ryelands Lane. Existing site roads are to be retained and supplemented to provide vehicular access to all 78 pitches. Pedestrian access will also extend across the site on the vehicular routes, as well as in the provision of a connection to the Miner's Walk Footpath along the eastern boundary of the site. This encourages visitors to walk, through the opportunity to access further walking routes.

5.2 Foul sewage disposal from the existing W/Cs and from a disposal point for chemical toilets is currently to a septic tank within the site. It is proposed that the foul sewage generated at the meet and greet building be diverted to a new treatment plant such as Premier Tech Aqua CSAF100N20 or similar. This is to be located on the open space near to the new building. Discharge of clarified water will be to a local drainage ditch on site.

5.3 Surface water will continue to be dispersed through local percolation across the site. The storm water collected from the roof of the new meet and greet building will be diverted to a soakaway within the vicinity of the building.

5.4 Electricity and water supplies to the existing 58 pitches will be reconfigured and extended to provide 78 serviced pitches.

## 6.0 RELEVANT LOCAL PLANNING POLICY

6.1 The site falls within the administrative area of Pembrokeshire County Council (PCC). PCC has prepared a Local Development Plan (LDP) covering the entire County other than the area of the Pembrokeshire Coast National Park. The LDP was adopted on 28<sup>th</sup> February 2013. The following policies in the plan are relevant to the determination of this planning application. Each is discussed in turn in relation to the impact of the proposed development.

### ***SP 1 Sustainable Development***

***All development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.***

6.2 The proposed development will provide for the long term viability of the caravan park and ensure the provision of a high quality touring caravan offer at the site within the Pembrokeshire countryside. The spin off benefits for the local economy in terms of visitor spend are protected and enhanced through the improvements and enhancements to the park. The environmental impacts of the development are minimised through the low density layout of pitches, the introduction of landscape planting and additional environmental biodiversity benefits such as the wildlife garden, the pond and tree planting.

### ***SP 5 Visitor Economy***

***Proposals for development relating to the visitor economy will be supported provided that they are in sustainable locations, contribute to the diversity and quality of accommodation and attractions, respect and protect the environment and benefit local communities.***

6.3 The application proposes the improvement and extension of the existing caravan park. While within the countryside, the location is within 300m of the settlement boundary of Kilgetty. Notwithstanding the locality, improvements to an existing park that will contribute to the diversity and quality of holiday accommodation across the plan area is far more sustainable than the creation of a wholly new park in a less desirable location. The benefits of the scheme to the local community include the likelihood of visitor spend in Kilgetty's local shops and restaurants, and the potential for visitors to local attractions such as the nearby Folly Farm. This is due to the lack of on-site shopping facilities or eateries. The scheme respects and protects the environment through visual, landscape and biodiversity enhancements.

**GN.18 Touring Caravan and Tent Sites**

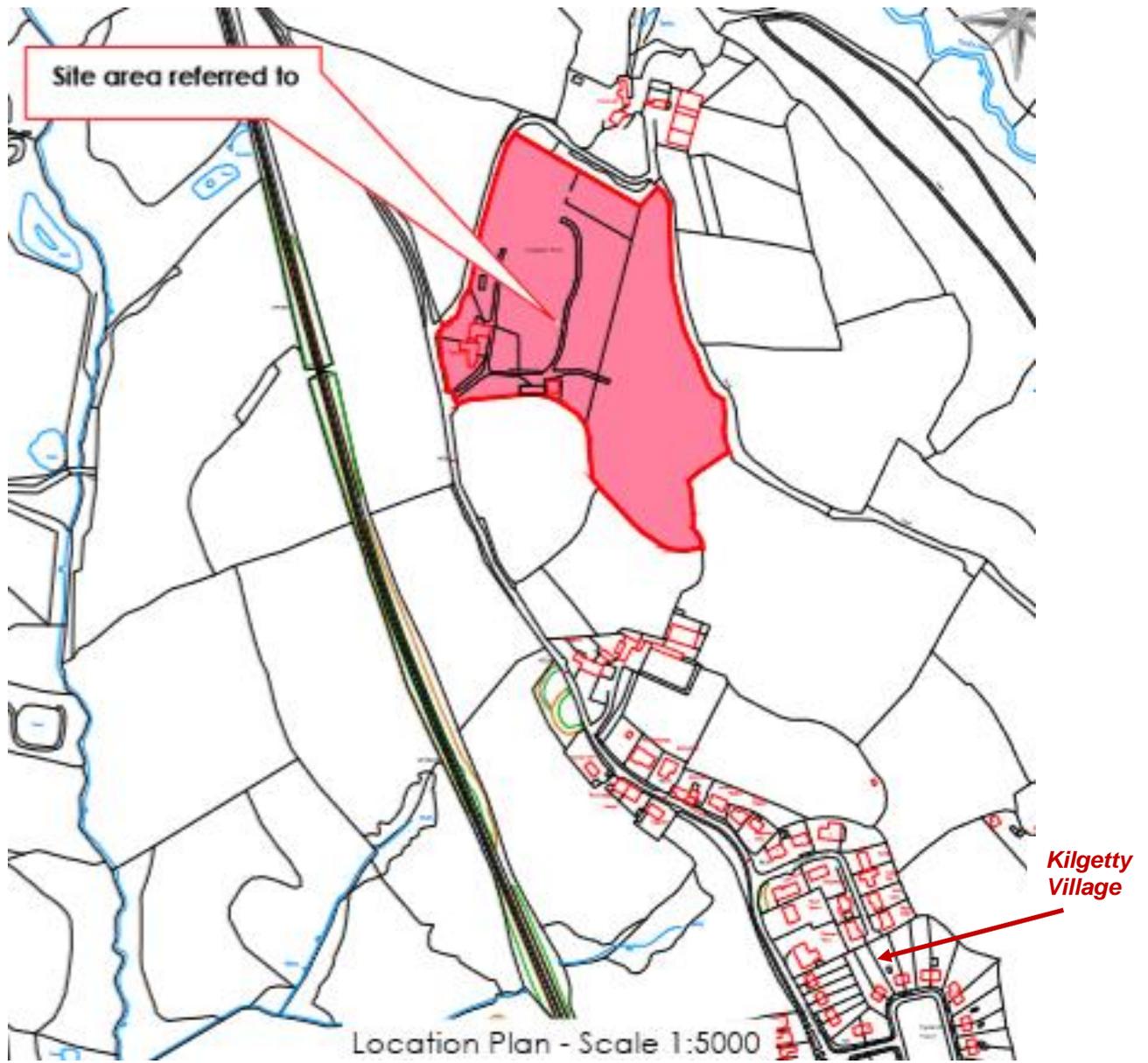
**A. New touring caravan and tent sites will be permitted if they fall outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty and provided that either:**

- 1. The site is within or well related to a settlement identified in the hierarchy as a Town, Service Centre or Service Village; or**
- 2. The site is within or well related to a Local Village and will provide a community facility not present within the existing settlement;**

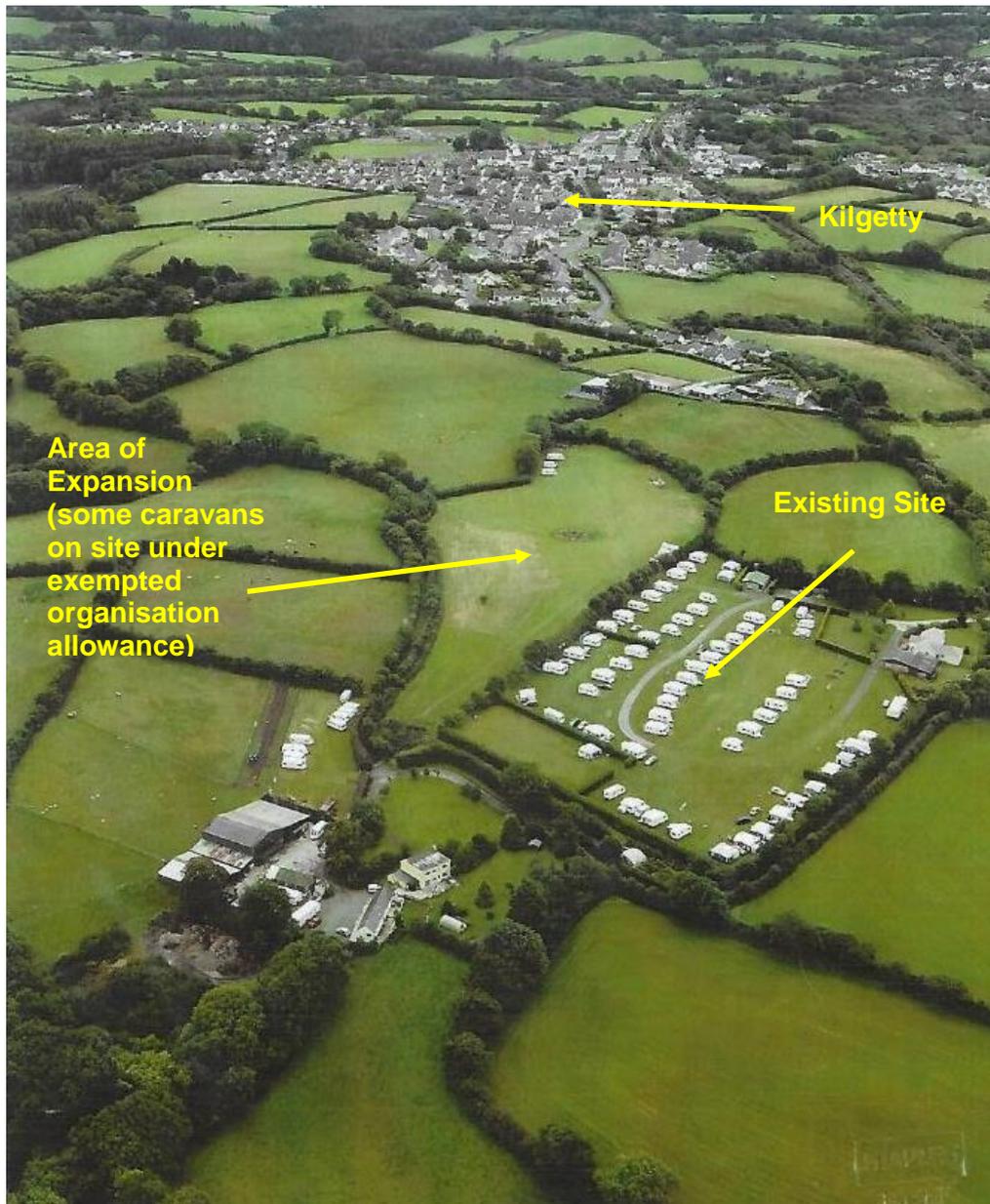
**B. The enlargement of the area of a touring caravan or tent site will be permitted where it would achieve a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape.**

**C. An increase in the number of touring caravan or tent pitches will be permitted where the site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty and would achieve a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape.**

6.4 Parts B and C of policy GN18 are relevant in this case (although no new caravans are requested). The subtext to the policy states that '*proposals for the extension of existing sites should demonstrate that an environmental improvement will be achieved both for the site and for its setting. Many existing sites in Pembrokeshire already provide a high quality offer and are operating at capacity. It is often preferable for these sites to expand than for new sites to develop to accommodate demand*' (paragraph 6.81). In this case, the site is an existing caravan park and the proposal results in the significant improvement of the tourism offer. The park is located outside of the far south east of Pembrokeshire (Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St Mary out Liberty), where the policy restricts the development of caravan parks. The site is well located, being within 300m of the settlement boundary of Kilgetty. Notwithstanding the limited physical and visual connectivity and the restricted access to the site, it is far better in policy terms to extend this park than introduce a new park. Furthermore, the location is in a less sensitive area than many other parks located around the sensitive coastline of the Pembrokeshire Peninsula.



*Site Location Plan (Drawing No. 01a) showing the proximity to Kilgetty*



*Aerial photograph showing the proximity to Kilgetty (Source: Skyscene Aerial Photograph Specialists, August 2014)*

#### **GN.20 Site Facilities on Existing Caravan and Camping Sites**

Proposals to upgrade and improve facilities on static caravan, touring caravan and tent sites will only be permitted where: 1. The proposal will not undermine the viability or vitality of a facility within a nearby settlement; and 2. The proposals incorporate the best practicable environmental standards covering all facets of the development.

6.5 The application proposes the erection of a new meet and greet building in association with the improvements proposed to the caravan park. Policy GN20 seeks to ensure that park facilities do not undermine local vitality and viability. The subtext to GN20 says, at paragraph 6.89, that the *'Authority is keen to see improvements that will increase the quality of the tourism offer provided in a way that*

does not harm the environment and landscape or impact negatively on facilities that are located in nearby settlements.’ In this instance the facilities building is primarily for W/C and changing, and also incorporates space to facilitate the smooth operation of the park (reception, office etc). The games room that is proposed is unlikely to have a significant adverse impact on local services in Kilgetty. The lack of an on-site shop / restaurant will demand that visitors leave the site and use local facilities in Kilgetty and beyond. This will provide increased visitor spend in the locality to the benefit of the local community. The size of the children’s play area is restricted and whilst providing more than adequate play space for the park, it is unlikely that this will affect the vitality and viability of local recreation spaces or visitor attractions.

Scan of Drawing 03b showing play areas – circled in blue



6.6 Paragraph 6.89b of the LDP goes on to state that ‘in a number of sites it will be desirable to improve washing and toilet facilities, and in larger sites the provision of additional facilities such as laundry facilities or a games room may be justified. Where possible existing structures or buildings should be re-used.’ There are no such existing structures or buildings on the site other than those that will remain in use as part of the facilities on site. In this case the expansion of the site and its resultant size justifies this improved offer with a games room alongside the washing and toilet facilities. At paragraph 6.90 the policy subtext says that the ‘design and siting of facilities needs to be sensitive to the landscape. Wherever possible applicants should incorporate Sustainable Drainage Systems into development to minimise surface water runoff. Any landscaping measures should maximise biodiversity and use native species appropriate to the landscape setting. Any buildings must demonstrate that they are in line with the requirements of the Council’s Design Guidance for

*Sustainability SPG.* The meet and greet building has been designed so as to minimise its impact on the landscape. The building is a low-level single-storey pitched roof design with a slate roof and timber horizontal cladding. The proposals for biodiversity enhancements across the site also assist in assimilating the building into its setting with the introduction of new hedge and tree planting.

### **GN.1 General Development Policy**

***Development will be permitted where the following criteria are met:***

- 1. The nature, location, siting and scale of the proposed development is compatible with the capacity and character of the site and the area within which it is located;***
- 2. It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels;***
- 3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;***
- 4. It respects and protects the natural environment including protected habitats and species;***
- 5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network;***
- 6. Necessary and appropriate service infrastructure, access and parking can be provided;***
- 7. It would not cause or result in unacceptable harm to health and safety;***
- 8. It would not have a significant adverse impact on water quality;***
- 9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.***

6.7 The proposed development has been sensitively designed for this landscape setting and, with reference to policy GN1, the relevant criteria have been complied with as follows:

GN1.1 – The extension of the touring pitches into the eastern field ensures that the layout and design of the park is substantially improved. The layout provides landscape enhancements that assimilate the new layout into the environment and provide screening of the caravans.

GN1.2 - The proposed park improvement will not result in significant additional noise, given the existing capacity of the park and given that the recreation activities designed into the scheme involve open space recreation and a small games room. There are no restaurant, bar or entertainment facilities proposed. In visual terms the extension of touring pitches into the eastern field will change the landscape in this area. However, mitigation is proposed in the form of the retention of existing boundary hedgerows, and the planting of new internal hedges and trees.

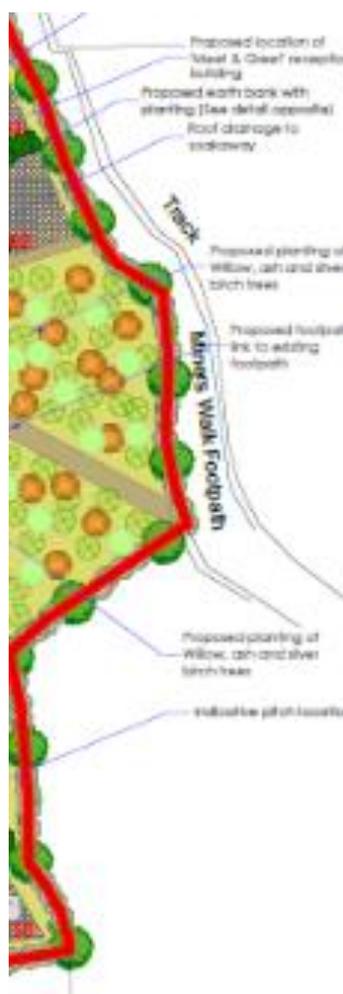
GN1.3 & GN1.4 - The landscape planting that is proposed as part of this proposal is significant. The existing and additional planting will ensure the retention of a green environment in views of the site. In addition, the new layout will provide improvements to the existing touring pitch area with new hedge planting between pitches and a less dense pitch layout. The proposed tree, hedgerow and wildlife garden planting across the site will contribute positively to this diverse natural landscape. The range of

biodiversity enhancements proposed, including the retained hedgerows, proposed trees, hedgebanks, bird box and the pond, will protect and enhance the range of habitats for protected species.

GN1.5 & GN1.6 - Highways matters in relation to the access via Ryelands Lane have been well rehearsed in sections 3.2-3.4 above. The proposal retains the existing number of caravans at a maximum of 78 on the site at any one time. Notwithstanding previous concerns about highways safety using the access along Ryelands Lane, the proposal will clearly reduce the amount of trips associated with towing vehicles due to the way in which the site operates (with a consistent client base and tourers retained on site). The use of the eastern field for touring pitches will reduce the use of the access by larger vehicles and towing vehicles associated with the existing rally use. Despite the restricted width of the access, the site is well located, with the train station and bus stops in Kilgetty within 1km of the site.

GN1.7 & GN1.8 - Neither water quality nor other health and safety concerns arise as a result of the proposed development.

GN1.9 - The nature and design of the proposed development will not result in the coalescence of settlements or the creation of ribbon development.



## GN.2 Sustainable Design

Development will be permitted where relevant criteria are met: 1. It is of a good design which pays due regard to local distinctiveness and contributes positively to the local context; 2. It is appropriate to the local character and landscape/townscape context in terms of layout, scale, form, siting, massing, height, density, mix, detailing, use of materials, landscaping and access arrangements / layout; 3. It incorporates a resource efficient and climate responsive design through location, orientation, density, layout, land use, materials, water conservation and the use of sustainable drainage systems and waste management solutions; 4. It achieves a flexible and adaptable design; 5. It creates an inclusive and accessible environment for users that addresses community safety; 6. It provides a good quality, vibrant public realm that integrates well with adjoining streets and spaces and 7. It contributes to delivering well designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.

6.8 In relation to policy GN2, the scheme provides a locally appropriate form of development, paying due regard to the landscape setting. The layout and landscaping proposed will ensure that the development makes a positive contribution to the landscape in this location. The scheme incorporates sustainable drainage systems and provides an attractively designed pedestrian access onto the adjacent Miner's Walk.

Scan from Drawing 03b showing the Miner's Walk Footpath

## 7.0 RELEVANT NATIONAL PLANNING POLICY

7.1 **Planning Policy Wales (PPW), Edition 9** contains national guidance to Planning Authorities when dealing with applications to develop land. The following paragraphs are particularly relevant in determining this application:-

7.2 PPW **Chapter 7 Economic Development** paragraph 7.6.1 says that '*Local planning authorities should adopt a positive and constructive approach to applications for economic development. In determining applications for economic land uses authorities should take account of the likely economic benefits of the development based on robust evidence. In assessing these benefits, key factors include:*

- *the numbers and types of jobs expected to be created or retained on the site;*
- *whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment'*

In this instance, the scheme will protect existing jobs associated with the operation of the park and provide a viable future for the caravan park. Furthermore, there are a number of spill-over effects for the local visitor economy in providing an improved and long-term viable accommodation offer in this locality.

7.4 PPW **Chapter 11 Tourism, Sport and Recreation** paragraph 11.1.1 states that '*Tourism is vital to economic prosperity and job creation in many parts of Wales. It is a significant and growing source of employment and investment, based on the country's cultural and environmental diversity. Tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas.*' As such, the Welsh Government's aim in paragraph 11.1.2 is for '*tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental well-being of Wales*'. Given the importance of tourism to the local economy, especially in Pembrokeshire, the fact that this proposal is to upgrade and expand an existing tourism facility should be given considerable weight in the determination of this application.

7.5 PPW Paragraph 11.1.4 says that '*the planning system should encourage sustainable tourism in ways which enable it to contribute to economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and those of local communities. In addition to supporting the continued success of existing tourist areas.*'

7.6 **TAN 13** Tourism (1997) recognises that '*Holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation, while using less land for the purpose*' (paragraph 12. In accordance with paragraph 13 of TAN 13, the proposal retains existing landscape screening and has been planned so as to reduce its visual impact through the introduction of hedge boundaries between each pitch. This ensures that the site remains green in local and wider views.

7.7 At paragraph 14, **TAN 13** encourages operators to '*improve the quality of their sites*' and encourages sites to be located away from the most sensitive areas such as the Heritage Coast. By improving this

existing facility within a less sensitive area of the Countryside, the need for the expansion of or creation of new facilities along the Heritage Coast or other sensitive areas is reduced. Paragraph 14 also accepts that *'In some cases, to facilitate improvement or relocation, local planning authorities may need to consider some expansion of the area covered by a site, so that improved layouts and better landscaping can be implemented.'* In line with paragraph 14, the application proposes the expansion of the area to be used for touring caravans, in order to improve the quality of the pitches, the layout of the site, the landscaping and the associated play and other facilities.

## **8.0 OTHER MATERIAL CONSIDERATIONS:**

### **PEMBROKESHIRE DESTINATION MANAGEMENT PLAN - adopted January 2013**

8.1 On 14<sup>th</sup> January 2013 the Pembrokeshire Destination Management Plan was adopted by the Cabinet of the County Council. The Director of Development included the following in his Report *"The aim of the Destination Management Plan is to safeguard and grow the visitor economy in order to improve the contribution it makes to the economic well-being of the County."*

8.2 The following are extracts from the Destination Management Plan that are relevant to the proposals at Ryelands Caravan Park:-

- Paragraph 2.1 – *'Unless facilities are improved, visitors will choose to go elsewhere where the facilities are better, leading to a further decline in profitability. Reversing this decline will help provide good quality full time and year round employment.'*

- Paragraph 3.2 – *'Product improvements are needed to keep pace with visitors' expectations. It is essential if we want visitors to make repeat visits. . . . .Businesses should be upgrading regularly and improving their facilities in order to improve profitability. There is a danger that competitor destinations provide a better level of facilities and visitors go to them instead.'*

- Paragraph 3.4 – *'Year round trading would solve many of the profitability, investment and employment issues but most destinations are trying to achieve the same thing. Increasing the number of visitors in spring and autumn is a more realistic objective.'*

8.3 Among the concluding objectives of the Pembrokeshire Destination Management Plan is Paragraph 4.3.4, which supports *'the continual improvement and upgrading of caravan and camping accommodation.'* The conclusion states that *'Holiday parks will continue to play an important role in Pembrokeshire's tourism offer and special attention should be paid to their quality and landscaping. Existing visitors to such sites and the potential new markets now demand a superior quality of environment.'*

8.4 All the above extracts from the Pembrokeshire Destination Management Plan emphasise the need for products that fit the current market, or even more importantly that meet perceived needs. The changing shape and size of touring caravans and the increasing desire to site them year round rather than move them to different destinations means that there is a requirement for high quality pitches. The visitors are also demanding an improved holiday environment, such as proposed here. The type of

repeat visits associated with the operation of this site (where tourers remain on site year round) provides for visitors who know and use local facilities.

## **BACKGROUND PAPER FOR LOCAL DEVELOPMENT PLAN: TOURISM STATIC AND TOURING CARAVAN AND CAMP SITES, MAY 2010**

8.5 The evidence base report to the LDP states that *‘Touring caravan occupancy is slightly higher in the South West Wales region than it is across Wales as a whole. This figure highlights the popularity of this type of holiday accommodation in this region.’* The report goes on to evidence a growing demand for touring pitches in Pembrokeshire with the occupancy rate as high as 87% in 2009, compared with 69% from data in 2006 and 49% in 1998. As such there is only a 13% capacity in the touring pitch provision across Pembrokeshire and an increasing demand for provision for this type of holiday accommodation in the region. The report supports the provision for this demand within existing sites and says that *‘A high proportion (65%) of existing sites are considered to be well related or adjacent to settlements. This is important because it maximizes the potential that visitors will visit nearby settlements and use facilities such as restaurants and pubs, thereby contributing to the local economy and also be able to access other attractions through the use of public transport’.*

## **8.0 CONCLUSION**

9.1 This application proposes the enhancement of Ryelands Caravan Park with the expansion of the site area to accommodate the approved 78 unit touring pitches with all year round holiday use and storage with landscape enhancements and additional facilities. This is consistent with the number of caravans that can already be on the site at any one time, in accordance with consents 15/1317/CL and D3/273/94. The proposal will significantly improve the layout of touring pitches and includes the erection of a new meet and greet building, new internal access roads, additional landscaping and children’s play areas.

9.2 Although it is recognised that the existing access road at Ryelands Lane has some constraints, the site is within 300m of the settlement boundary at Kilgetty and within 1km from the train station, bus stops and local shops and amenities there. The proposed development has overcome previous concerns related to the use of Ryelands Lane by towing vehicles. This is due to the way in which the site clearly now operates (with a consistent client base and tourers retained on site), and due to the removal of rally events from the eastern field, and provision of secure facilities to retain caravans on site year round.

9.3 The improved facilities, including recreation space, children’s play area and a new meet and greet building, are appropriate in scale and nature for this park and will not harm the vitality and viability of nearby visitor attractions or local communities. Rather, the scheme will provide regular repeat visitors to this area north of Kilgetty to the benefit of local shops and restaurants and other visitor attractions nearby.

9.4 The proposal has been sensitively designed with substantial landscape planting to retain a green environment that respects this landscape setting and provides an improved tourism offer for visitors. The additional biodiversity enhancements in the form of a new pond, tree planting, new hedgerows

between each touring pitch, wildlife gardens and bat and bird boxes will enhance the biodiversity of the site as a whole.

9.5 The proposal is consistent with the relevant policies of the Local Development Plan and with other relevant national and local planning guidance.

If any further information is required or alternative options/solutions need to be discussed please do not hesitate to contact Hayston Developments & Planning Ltd.

**REPORT PREPARED BY  
PETER ROBERTS BSC HONS, MA  
SENIOR PLANNER**

**REPORT REVIEWED BY  
ANDREW VAUGHAN-HARRIES BSC DIP TP MRTPI  
DIRECTOR/PRINCIPAL PLANNER**



**RTPI**

mediation of space · making of place

# APPENDICES