

PLANNING AND RIGHTS OF WAY COMMITTEE

Report of: Director of Development

Date: 13 December 2016

Application No.: 16/0301/PA

Proposed Development: Change of use of agricultural land to holiday caravan and camping park to include: use of land for the siting of themed lodges, touring caravans and glamping (safari style ridge tents; circus style bell tents; conventional bell tents, teepee or yurt); erection of shower blocks and access control kiosk; conversion of various farm buildings to form ancillary café, reception/shop and games room/overflow café; use of the existing farm house for warden's accommodation; drainage and landscaping infrastructure; extension of a zoo animal enclosure

Location: Windberry Top Farm, Begelly, Kilgetty

Applicant: Folly Farm Leisure Limited

THIS APPLICATION IS FOR COMMITTEE CONSIDERATION AS THE APPLICATION INCLUDES TOURIST DEVELOPMENT OVER 0.5 HECTARES IN AREA AND DEVELOPMENT THAT IS CONTRARY TO THE DEVELOPMENT PLAN BUT WHICH IS BEING RECOMMENDED FOR APPROVAL (PARAGRAPHS 1(g) AND 1(n) OF THE SCHEME OF DELEGATION)

1. Recommendation:

1.1 It is recommended that the application be APPROVED subject to:

- Completion of a section 106 legal agreement (to deliver a financial contribution to pedestrian infrastructure as detailed in paragraphs 6.30 and 6.31).
- Advertised as a departure from the Local Development Plan in accordance with The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended). Consideration of any new issues arising from this publicity to be delegated to the Head of Planning.

- Referral to Council for final determination due to departure from the Local Development Plan.

and the following planning conditions:

- Time period for implementation
- Compliance with approved plans
- Existing access emergency vehicles only & no pedestrian access
- Conversion of buildings prior to first use of accommodation
- Prior approval of landscaping (including landscape management plan)
- Prior approval of external lighting details
- Tourist accommodation only
- Maximum number of each type of accommodation
- No external storage of caravans
- Prior approval of appearance of accommodation
- Dwelling - warden's accommodation only
- Prior approval of materials (new buildings, converted farm buildings & outside spaces)
- Shop (compliance with approved plans & ancillary only)
- Prior approval of control kiosk details
- Building subject to potential use as sports hall - separate planning application required
- Prior approval of sustainability strategy
- Prior approval of on-site access route & signage
- Prior approval of bat conservation strategy (ecological mitigation)
- Prior approval of biodiversity enhancement measures
- Compliance with visitor management plan
- Control of construction hours
- Prior approval of fence near eastern boundary (noise mitigation)
- Site investigation and mitigation (former coal mining activities)
- Prior approval of surface water drainage details
- Connection to public sewer & no occupation until necessary improvements to foul sewer network undertaken

2. Main Issues:

2.1 The main issues to be considered with this application are whether:

- The principle of development is acceptable (policies SP 1, SP 5, SP 12, SP 16, GN.11, GN.15, GN.16, GN.18 and GN.19)
- There are adverse visual/landscape effects (policies GN.1 and GN.2)
- An acceptable design is achieved (policies GN.1, GN.2 and GN.11)
- Transportation matters are appropriately addressed (policy GN.1)
- Nature conservation interests are protected (policies GN.1 and GN.37)
- Drainage arrangements are acceptable (policy GN.1)
- Whether there exist any other planning considerations that are material to the determination of the application

3. Description of site

- 3.1 The application site comprises approximately 11 hectares of agricultural land. A complex of farm buildings and a farmhouse is located towards the site's north-eastern corner. A phone mast is situated to the west of the farm buildings. Land generally falls towards the south and south-west. Access is via a private lane that joins the A478 at the south-eastern corner of the application site.
- 3.2 The north, west and east boundaries are defined by mature hedgerows. Another hedgerow bisects the site to the west and to the east of the farm buildings. The southern boundary is defined by security fencing and a hedgerow, the other side of which is the Folly Farm Adventure Park and Zoo (the Adventure Park) car park. The Adventure Park consists of animal enclosures, fairground rides, indoor and outdoor adventure play, nature walks, cafe, a gift shop and amenities. Four dwellings bound the site to the east. The locality is characterised by sporadic residential properties within an agricultural setting but with the substantial existing site of the Adventure Park to the south and south-east. The main part of the application site is approximately 630 metres from the northern most part of the settlement of Begelly.

4. Proposal

- 4.1 The application seeks full planning permission for the change of use of agricultural land to a holiday caravan and camping park to include:
- Timber lodges (27 units); Showmen's wagons (29 units); Touring caravans (43 units); Safari-style ridge tents (15 units); Circus-style bell tents (11 units); Conventional bell tent, teepee or yurt tents (10 units) (135 units in total)
 - Toilet and shower blocks
 - Access control kiosk to provide entry into the Adventure Park
 - Associated infrastructure (including attenuation pond)
 - Extended safari enclosure into the application site
 - Conversion of barns to cafe, games room/overflow café and reception/shop
 - Other buildings to be re-used for caravan storage, holiday park servicing, ground-keeping and maintenance
 - Existing farmhouse to be used for warden's accommodation
 - Vehicular access through southern boundary onto the existing access road serving the main car parks at Folly Farm. Access/egress via the existing Folly Farm access on the A478.
- 4.2 The application states that the proposal will be used in conjunction with the wider operation and use of the Folly Farm visitor attraction. The application is described as:

A holiday village as an extension to the very successful Folly Farm Adventure Park and Zoo.

The addition of the proposed holiday village has been conceived as a scheme that provides short and medium stay accommodation which is specifically linked to the main Folly Farm Adventure Park and Zoo in operational and tourism/business terms. Most people staying within the accommodation will spend a sizeable proportion of their time within the Folly Farm.

The development is conceived as a unique, high quality concept that will bring a new product to Pembrokeshire, if not to the UK as a whole. The development proposes to take the most successful and well-known elements of the Folly Farm visitor attraction and create a themed holiday village in which visitors can stay in an immersive holiday environment. It will feature a range of accommodation types within themed zones that reflect the main themes of Folly Farm. It will all be set within an outstanding landscape that incorporates theme-appropriate planting in an overall native landscape structure.

The proposed development will create a distinctive holiday destination for Pembrokeshire that will increase the profile of Folly Farm and Pembrokeshire as a whole, drawing visitors from a wide catchment. This will have numerous positive benefits, such as extending the tourism season, creating jobs and increasing spending in the local economy.

5. Planning History

- 5.1 Whilst there is an extensive planning history in respect of the growth of Folly Farm, there exists no planning history in relation to the application site itself that is relevant to this planning application.
- 5.2 In accordance with the Environmental Impact Assessment Regulations, an EIA Screening Opinion has been adopted confirming that EIA is not required (ref.SC/0836/15).

6. Evaluation

Local Development Plan

- 6.1 Policy SP 1 (Sustainable Development) of the Local Development Plan (LDP) is an overarching strategic policy which requires all development to demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. This report will demonstrate that the development will result in positive impacts with any adverse impacts being minimised.
- 6.2 Policy SP 5 (Visitor Economy) supports proposals relating to the visitor economy providing that they are located within sustainable locations, contribute to the diversity and quality of attractions, respect and protect the environment and benefit local communities. This report will demonstrate that

the development will contribute to the diversity and quality of attractions, respect and protect the environment and benefit local communities by reason of positive socio-economic effects.

- 6.3 If the application was for a standalone site, the development would not be considered to be at a sustainable location but, due particularly to its relationship with the existing Folly Farm attraction as well as proposed improvements to the footpath route into the nearest settlement at Begelly, together with other positive effects that are identified in this report, its location can be considered acceptable having regard to policy SP 5.
- 6.4 Policy SP 16 (The Countryside) promotes development in relation to enterprises for which a countryside location is essential provided that visual impact is minimised. Policy SP.16 also supports the re-use of appropriate existing buildings. Whilst, as a standalone development in land use terms, a countryside location unrelated to any settlement is not essential, the proposal's physical and operational relationship with Folly Farm necessitates the proposed location. The report will demonstrate that visual impact will be minimised and that the proposal includes the re-use of appropriate rural buildings.
- 6.5 Begelly is a "Service Village" as identified in Policy SP 12 (The Settlement Hierarchy). A "Service Village" is defined as "a settlement with a good range of services supporting wider than the immediate community". The proposal includes touring caravans, safari-style ridge tents, circus-style bell tents and conventional bell tents, teepee & yurt tents. Policy GN.18 (Touring Caravan and Tent Sites) supports new touring caravan and tent sites where the site is outside of specified Community Council areas and where the site is well related to a settlement identified as a Town, Service Centre or Service Village. Begelly is not within those specified Community Council areas and is defined as a "Service Village". The policy test is therefore whether the site is "well-related" to the settlement.
- 6.6 The LDP defines "well-related" as "well related to the built form of a settlement in terms of proximity, physical connectivity and visual relationship". The main part of the application site is approximately 630 metres from the northern most part of the settlement of Begelly (but with the existing Folly Farm site in between); thus a lack of physical proximity. There exists no visual relationship with the settlement of Begelly. Physical connectivity is poor due to distance as well as the intermittent nature of the footpath along the A478. As such the site is not "well-related" to Begelly and therefore fails to meet the GN.18 policy test in this respect.
- 6.7 The proposal includes timber lodges and showmen's wagons; these are considered under policy GN.19 (Static Caravan Sites). Policy GN.19 supports new static caravan and chalet sites where the site is within the boundary of a defined settlement. The site is not within a settlement and therefore the proposal fails to accord with policy GN.19.
- 6.8 The proposed conversion of the farm buildings can be regarded as an employment use and provide ancillary facilities directly associated with the

proposed tourism accommodation. Policy GN.11 (Conversion and Change of Use of Agricultural Buildings) supports such development provided the buildings are physically capable of accommodating the new use without extensive alteration or extension (and external works are appropriate). The buildings are proposed to be converted without unacceptable alteration. Traditional materials would be utilised, the exact details of which would be subject to a planning condition. The proposal accords with policy GN.11.

- 6.9 The existing farmhouse would be re-used as warden's accommodation. A condition is recommended in this respect as the building and its use as warden's accommodation is an integral part of the development; it would be unsuitable as an unrestricted dwelling.
- 6.10 The proposal includes a small retail floor-space comprising approximately 12 sq.m. net (22 sq.m. gross) that will provide a shop for those staying at the holiday park. Whilst this retail element fails to accord with policy GN.15 (Small Scale Retail) that requires small scale retail facilities to be located within a settlement boundary, considering its scale and ancillary nature, it is considered acceptable. However, a condition must be applied controlling the extent of retail floor-space to that proposed and ensuring that it is ancillary only (ie. only used by those staying at the Holiday Village). Subject to such conditions, there would not be a material effect on retail uses in existing centres and thus there would be no conflict with the broader objective of policy GN.15.
- 6.11 The proposal includes the extension of the consented safari enclosure at the Adventure Park into the application site. Policy GN.16 (Visitor Attractions and Leisure Facilities) allows for such development provided the scale and nature of the facility and its extension would be compatible with its location. The detailed assessment of the effects of the proposal will demonstrate that this is indeed the case and thus there exists no conflict with policy GN.16.

Visual & Landscape Effects

- 6.12 Policy GN.1 allows development when it is compatible with the capacity and character of the site and area, would not result in a significant detrimental impact on local amenity in terms of visual impact, would not adversely affect landscape character, quality or diversity, and does not contribute to the coalescence of settlements or ribbon development. Policy GN.2 (Sustainable Design) requires development to be appropriate to the local character/townscape context and to be of good design (with the policy describing the detailed requirements in this respect).
- 6.13 The application is supported by a Landscape and Visual Impact Assessment (LVIA) as well as detailed landscape proposals. Whilst a relatively extensive development in area, no large or tall structures are proposed. The core of the development would be centred on the existing farm buildings which are to be substantially retained in their original form. Other than the cut necessary to provide a drainage attenuation pond (to also act as a feature within the

extended safari enclosure), proposed levels across the site would respond to existing topography.

- 6.14 The character of the area is one of rolling farmland with boundary hedgerows but with this character affected by the presence of the existing Folly Farm leisure development to the south (as well as existing electricity cables and pylons). The LVIA describes how the design of the development would integrate with the surrounding landscape and subject to the implementation of landscaping in accordance with the submitted strategy; it is not considered that the effects of the development would result in a change in landscape character at a local or wider scale.
- 6.15 Views of the site, such as from the Landsker Borderlands Trail (120m to the north and 430m to the east), would be limited. Views from the railway (450m to the east) and the surrounding road infrastructure, including the A478, would be glimpses with the main feature from these views being of the existing farm buildings. Visual effects would not be significant.
- 6.16 An adverse visual effect would be experienced from the dwellings to the east, although this will be limited at ground floor level owing to an existing boundary hedge to the rear of these properties. From the upstairs of the houses, there will be initial detrimental visual effects, although these will diminish as the landscaping belt that is proposed, to the rear of these dwellings, develops. Other dwellings in the locality are at a greater distance and views of the development will be filtered by intervening hedgerows and trees.
- 6.17 Proposed landscape details and overall landscape strategy represent a bespoke response to the site and nature of proposed development; details are comprehensive and robust, and would contribute to the delivery of good design quality. A planning condition is recommended to agree all aspects of the planting and hard landscaping as the success of the design will be dependent on the quality of these details. These details must be informed by the landscaping proposals that are set out in the application. Similarly the prior approval of external lighting details and a landscape management plan is also required by planning condition.
- 6.18 Subject to the recommended planning conditions, there would be no significant detrimental impact on visual amenities and no adverse affect on landscape character. The proposal, having regard to visual and landscape effects, would accord with policies GN.1 and GN.2.

Design

- 6.19 Policy GN.2 requires development to be “of a good design which pays due regard to local distinctiveness and contributes positively to the local context”, is “appropriate to the local character and landscape/townscape context”, incorporates a resource efficient, climate responsive, flexible and adaptable design, one that is inclusive and accessible (that addresses community safety). Policy GN.4 (Resource Efficiency and Renewable and Low-Carbon Energy Proposals) requires development to seek to minimise resource

demand, improve resource efficiency and seek power generated from renewable resources where appropriate, and to be well-designed in terms of energy use. Policy GN.1 objectives in respect of design are set out in paragraph 6.12.

- 6.20 A range of accommodation types are proposed in three themed zones that are intended to reflect the main themes of Folly Farm: “safari”, “fairground” and “farm”. The “safari” zone will include timber holiday lodges and safari-style ridge tents at the western end of the application site centred on an extended animal enclosure. The “fairground” zone is intended to provide a cue to the vintage fairground at Folly Farm and will comprise static caravans that would have the appearance of historic showmen’s wagons as well as “glamping” in the form of circus-style bell tents. The third theme will be the “farm” zone at the eastern end of the site around the existing farm complex where touring caravans, as well as yurts and/or teepees, would be sited within a series of paddocks. A fourth area will be the existing farm complex that will become a focus for guest services, reception/information, games room and cafe. All zones would have landscaping that reflects their character themes. Parking will be informally spread across the site. The submitted details indicate that attractive outdoor spaces would be provided (subject to the agreement of details by planning condition).
- 6.21 The proposed development includes three toilet/shower block buildings primarily of timber clad elevations under a slated roof. Two traditional stone barns will be converted to a reception/shop/information and cafe buildings. A contemporary agricultural barn will be converted to a games/cafe overflow room. Two other agricultural buildings will be retained for storage. The existing farmhouse will become warden’s accommodation. A small access control kiosk is also proposed (but with no details provided). Another larger agricultural building is described as “potential future use of sports hall”.
- 6.22 Both the proposed new buildings and those to be converted would comply with relevant planning policy (including policy GN.11). However conditions are necessary to achieve certainty over the use of external materials (including finishing to windows and door openings) and to approve the design of the control kiosk. A planning condition is also necessary to clarify that the building subject to potential future use as a sports hall would need to be subject to a separate planning application.
- 6.23 A Sustainability Statement has been submitted in support of the application to demonstrate that sustainable development principles have been considered and how these would be further embedded throughout the lifecycle of the development. The Statement sets out a number of objectives and aspirations including the creation of a “high quality built environment”. The Statement includes the objective of securing top accreditation in a reputable Conservation Award Scheme. In terms of accessibility for disabled users, the Statement describes how such matters have been considered as part of the proposed design. The Statement is supported by an Energy Report detailing a series of potential proposals for the reduction of carbon emissions including the delivery of a centralised energy centre at the site.

- 6.24 Whilst both documents are consistent with the objectives of policies GN.1, GN.2 and GN.4 as well as national planning policy, a planning condition to require an updated Sustainability Strategy that is informed by the objectives of the Statement and Energy Report but which provides specific detailed proposals in respect of energy use and carbon reduction, inclusive access and waste minimisation (water and materials) is recommended and, for the reasons explained at paragraph 6.49, this would be expected (as is proposed in the application) to exceed the minimum levels required of planning policy.
- 6.25 PPW states that local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. The proposed development has satisfactorily addressed matters of community safety and this is explicit in the design details submitted in support of the application. The proposed development is consistent with a number of well-being goals (of the Future Generations (Wales) Act 2015).
- 6.26 Subject to the recommended planning conditions, a good quality design would be delivered that would positively respond to its context, one which also has a clear design relationship with the existing Folly Farm premises. The development would be compatible with the capacity and character of the site and area and would not adversely affect landscape in accordance with policy GN.1. The development would be of good design and accords with the relevant tests of policies GN.2 and GN.4.

Traffic & Transportation

- 6.27 Policy GN.1 allows development where it would take place in an accessible location and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network; and it would incorporate sustainable transport and accessibility with necessary and appropriate service infrastructure, access and parking.
- 6.28 Following consideration of the Transport Assessment submitted in support of the application, it is confirmed that there exists adequate traffic capacity within the highway network to cater for the proposed development; there will be no unacceptable impact on highway safety. The internal layout in relation to access to the proposed accommodation and farm complex, and associated car parking, is acceptable.
- 6.29 The access into the development is proposed to use the existing main Folly Farm access. The current layout is informal and could result in an element of confusion for those looking to access the holiday park. This could have the potential to cause queues back to the highway. In order to prevent this, details of the on-site access route, to include signage, is required to be approved by condition. The existing access is for emergency vehicles only and due to the lack of a footpath it should not be used by pedestrians; a condition is recommended to this effect.

- 6.30 Folly Farm is served by existing bus services. However, pedestrian accessibility to and from the nearest settlement at Begelly is poor due to the quality and intermittent nature of the footpath link along the A478. The application states the explicit objective to deliver a development that is accessible by foot. Having regard to the scale of the development and the conflict with policies GN.18 and GN.19, it is necessary to improve the pedestrian route into Begelly. As such a financial contribution of £35,000 is required, to be delivered via a Section 106 legal agreement, to ensure the delivery of the necessary pedestrian infrastructure improvements. Such an approach accords with policy GN.3 (Infrastructure and New Development) and Supplementary Planning Guidance on Planning Obligations.
- 6.31 Having regard to the operational and physical relationship with the existing Folly Farm site, existing bus services and the pedestrian infrastructure improvements that will be delivered, the proposal is considered accessible for the purposes of policy GN.1. Subject to the recommended planning conditions, as well as the section 106 agreement to secure the necessary pedestrian infrastructure improvements, the proposal will accord with policy GN.1 in respect of access and transportation.

Nature Conservation

- 6.32 Policy GN.1 requires development to respect and protect “the natural environment including protected habitats and species”. Policy GN.37 (Protection & Enhancement of Biodiversity) states that development should demonstrate a positive approach to maintaining (and, wherever possible, enhancing) biodiversity; “development that would disturb or otherwise harm protected species or their habitats ... will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures”.
- 6.33 Surveys have been undertaken and bat species identified in the existing buildings. However, providing the proposed mitigation set out in the submitted ecology report is implemented, the proposal is unlikely to be detrimental to the maintenance of the favourable conservation status of the bats. A specific bat conservation strategy, based on these mitigation measures, should be implemented. Having regard to the merits of the overall planning case for this development, a package of ecology enhancement measures should also be delivered. A condition to agree external lighting details in the interests of protecting biodiversity interests is also recommended. Subject to the imposition of the necessary planning conditions, the proposal will accord with policies GN.1 and GN.37.

Drainage

- 6.34 Policy GN.1 requires development to provide for necessary and appropriate service infrastructure including foul and surface water drainage. Policy GN.2 states that development should incorporate a resource efficient and climate responsive design including in terms of water conservation and the use of sustainable drainage systems.

- 6.35 Planning Policy Wales (Edition 9, November 2016) (PPW) advises that “development proposals in sewered areas must connect to the main sewer and it will be necessary for developers to demonstrate to local planning authorities that their proposed site can connect to the nearest main sewer”. The application proposes connection to the main (public) sewer which is feasible. PPW further states that “the adequacy of water supply and the sewage infrastructure are material in considering planning applications”.
- 6.36 Dwr Cymru Welsh Water objects to the proposed development because a connection to the main (public) sewer would overload the treatment works and no improvement works are planned. All water utility companies, such as Dwr Cymru Welsh Water, have a legal obligation under the Water Industries Act 1991 to provide developers with the right to connect to a public sewer regardless of capacity issues. The Water Industries Act 1991 in effect makes it very difficult, if not impossible, for Dwr Cymru Welsh Water to object or for the Council to refuse to grant planning permission. The Water Industries Act 1991 specifically requires Dwr Cymru Welsh Water to accommodate the development whatever the circumstances. Case law has also established that a developer has an absolute right to connect to the existing sewer, whether or not this overloads the system, and that the specific wording of the legislation allows for this right to be exercised, at no cost to the developer apart from normal physical connection charges.
- 6.37 Nevertheless, the adequacy of sewage infrastructure is a material consideration as confirmed in PPW and the LDP (policy GN.1). Therefore, whilst there is a separate statutory regime governing the provision of sewerage and waste water treatment under the Water Industries Act 1991, it does not take away the opportunity for a local planning authority to consider the potential impacts, and to ensure that those impacts are adequately mitigated before that development is undertaken.
- 6.38 The use of a “Grampian” style condition as being the appropriate method to address this issue was confirmed in the aforementioned case law: *“the planning authority can make planning permission conditional upon there being in place adequate sewerage facilities to cater for the requirements of the development ... the planning authority can make planning permission conditional upon the sewerage authority first taking any steps necessary to ensure that the public sewer will be able to cope with the increased load”*. As such it is recommended that a planning condition be imposed requiring that the use is not commenced until works to improve the public foul sewerage network to cope with the additional flows resulting from the proposed development have been completed. This would be in accordance with policy GN.1.
- 6.39 The application states that surface water drainage will be to soak-away and a sustainable drainage system. Full details are required to be approved by planning condition. Whilst not within an area that is at risk of flooding, a flood consequence assessment provides a strategy for addressing any potential for localised flooding as a result of the development, including the incorporation

for an attenuation pond, and this will form part of the surface water drainage details to be approved by condition. Subject to the recommended planning condition, the development will accord with policy GN.1.

Other Matters

Amenity

- 6.40 Policy GN.1 requires, amongst other matters development to 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” and “unacceptable harm to health and safety”.
- 6.41 The nearest neighbouring properties are to the east of the application site facing the A478. The visual impact for these properties is addressed at paragraph 6.16. The other main issue is whether there exists a significant detrimental impact in respect of noise. In order to protect these properties from unacceptable noise intrusion, a 1.8m high fence adjacent to or near the boundary is recommended by the Head of Public Protection. Subject to a condition in this respect, there will be no conflict with policy GN.1 in respect of amenity.
- 6.42 The removal of farming activities will have a limited positive effect on amenity for the nearest neighbours. No other neighbours will be significantly affected. It is recommended that construction hours be controlled by condition in the interest of protecting the amenities of those living nearby.

Agricultural land

- 6.43 The application site is Grade 3 agricultural land as defined in the Land Classification Map. Whether this is sub-grade 3a (of good quality) or sub-grade 3b (of moderate quality) is not defined but evidence submitted in support of the application suggests that the land is unlikely to be Grade 3a. National planning policy states that grades 1, 2 and 3a agricultural land should be conserved for the future as it is a finite resource and considerable weight should be given to protecting such land from development. Whilst the proposal will result in the loss of a parcel of agricultural land, the land is unlikely to be the best grade of agricultural land and the benefits of the development outweigh the limited loss.

Coal Mining

- 6.44 The application site falls within the defined Development High Risk Area where there exist coal mining features and hazards which need to be considered in the determination of a planning application. Following the advice of The Coal Authority, a Coal Mining Risk Assessment Report was submitted. The Report identifies that the site has been subject to past coal mining activity. The Coal Authority recommends a condition requiring site investigation works (to also include treatment to mine entries and other necessary remedial measures) prior to the commencement of development.

Subject to the recommended planning condition, the proposal will accord with policy GN.1 (in respect of health and safety matters) and national planning policy.

Historic Environment

- 6.45 An historic environment desk-based assessment was submitted in support of the application. There are no designated historical assets within or near the application site and none that will be adversely affected by the proposal. The potential of unknown archaeological deposits is low. There is thus no conflict with Policy GN.38 (Protection and Enhancement of the Historic Environment).

Prior Extraction of Mineral Resource

- 6.46 The application site is situated within an area of mineral resource where the prior extraction of any economic reserves must be achieved, where appropriate, prior to commencement of development to accord with policy GN.22 (Prior Extraction of the Mineral Resource). There are environmental issues that are likely to preclude the acceptability of prior extraction in this instance, not least being the proximity to existing properties and Folly Farm. As such, the proposal would not conflict with the objectives of policy GN.22.

Representations

- 6.47 Representations have raised a number of relevant issues and these have been addressed in this report. On the matter of precedent and “over-development of holiday parks”, each case must be assessed on its own individual merits and the case for this development, having regard to relevant planning policy, has been assessed in this report.

Other Material Considerations

- 6.48 There are clear operational and physical linkages to the adjoining Adventure Park. A Visitor Management Plan was requested of the applicants and this confirms the intention to offer free and/or significant discounted entry into the Adventure Park for those staying at the Holiday Village; provides details of dedicated internal access arrangements between the Holiday Village and the Adventure Park; and describes how the accommodation would be laid out and promoted to reflect the main themes of Folly Farm: ‘safari’ (the zoo of exotic animals), ‘fairground’ (the vintage funfair) and ‘farm’ (the working farm). Many of the attraction’s services including the restaurants and shops would also serve guests of the Holiday Village. The safari enclosure will be extended into the site (and will be adjacent to proposed accommodation thus providing an innovative and distinctive experience for visitors). The sharing of the access with the Adventure Park provides a further physical link.
- 6.49 The proposal provides a distinctive and bespoke product, particularly owing to its relationship with the Adventure Park, and a quality accommodation offer (including for people with disabilities - a specific objective of the Pembrokeshire Destination Management Plan). The design credentials

described in this report in some respects exceed the minimum requirements of planning policy including in relation to sustainability objectives; this is essential if the presumption against the development by reason of policies GN.18 and GN.19 is to be overcome. In order to be accorded appropriate weight, the quality of product that is proposed, including its design, must be delivered and planning conditions would be necessary to ensure that this is the case, including control over the exact type of accommodation. To the extent that the objectives of policies GN.18 and GN.19 aim to prevent visual intrusion, the proposal will have limited harm particularly given the high quality and themed appearance of many of the units, the extensive landscaping proposed and the context provided by the existing Folly Farm attraction.

- 6.50 The Wales Spatial Plan (2008 Update) (WSP) identifies the importance to Pembrokeshire of “a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access and internationally important energy and tourism opportunities”. A key strategic priority includes increasing higher value-adding economic activities, particularly in the rural economy, by developing an all-year, high quality tourism and leisure sector. The proposal, as addressed in this report, will comprise a distinctive and innovative development, one of high design quality with strong linkages to Folly Farm. The development will enhance the use of the existing attraction for year-round use and be beneficial to the local economy. In the absence of significant adverse environmental effects, the proposal would be consistent with the objectives of the WSP.
- 6.51 Folly Farm currently attracts 500,000 visitors each year and is a successful visitor attraction at a national scale. The proposal will provide both short and medium stay accommodation specifically linked to Folly Farm in operational and tourism/business terms. The applicant anticipates that most people staying at the Holiday Village will spend a sizeable proportion of their time at the Adventure Park. The applicant estimates that the delivery of the development requires an investment of £8 million. The development itself will create new employment opportunities (16 jobs – 9 full-time equivalent) and the accommodation will create jobs and generate additional spend within the local economy. PPW identifies the importance of the tourism industry to economic prosperity and job creation in many parts of Wales. The proposal will be consistent with these objectives as well as similar objectives in TAN13 Tourism (1997) and TAN23 Economic Development (2014). At a local level, the proposal will contribute to objectives of The Pembrokeshire Destination Management Plan 2013-2018, including the strengthening of year-round appeal and quality of offer, as well as the Pembrokeshire Economic Development Strategy and Action Plan 2017-2022.
- 6.52 In view of the quality and bespoke nature of the development as well as its inherent physical, operational and thematic links with the existing Folly Farm premises, these are matters that are considered to have significant weight in the determination of the planning application. It is clear that the proposal is not one that can be considered in isolation, divorced from the rest of the Folly Farm attraction. The proposal will result in socio-economic benefits and will

contribute to wider objectives in relation to the tourism economy; albeit that these matters should be accorded lesser weight.

Conditions

- 6.53 A number of planning conditions, as detailed in paragraph 1.1, are necessary to ensure the development is acceptable in planning terms and also to ensure that those matters that form part of the identified “other material considerations” are delivered. These conditions accord with the tests laid down in Circular 016/2014 (The Use of Planning Conditions for Development Management).

Conclusion

- 6.54 The proposal would conflict with policy GN.18 (Touring Caravan and Tent Sites) because the site is not “well-related” to Begelly. Nevertheless, it is of note that the site’s connectivity to Begelly will be enhanced by reason of the improvements to pedestrian infrastructure. The proposal would conflict with policy GN.19 (Static Caravan Sites) as the site is not within a settlement. The proposal would also conflict with a strict application of policy GN.15 (Small Scale Retail) but not, because of the planning condition that is proposed, with the broader objective of that policy.
- 6.55 The proposal will result in socio-economic benefits and will be consistent with a number of wider objectives in relation to the tourism economy; including some strategic objectives of the LDP as well as national planning policy and guidance. However, whilst these matters should be accorded weight in the determination of the application, they are not sufficient in themselves to overcome the conflict with policies GN.18 and GN.19.
- 6.56 The bespoke nature of the development that is proposed and its inherent physical, operational and thematic links with the existing Folly Farm premises, are matters that are considered to have significant weight in the determination of the planning application. It is clear that the proposal is not one that can be considered in isolation, divorced from the rest of the Folly Farm attraction. Added to this is the standard of design quality that will be achieved.
- 6.57 The weight to be accorded to these “other material considerations” together with the planning merits of the case in relation to all those matters identified in this report, are considered to be sufficiently material to overcome the conflict with policies GN.18 and GN.19 (subject to the recommended planning conditions and Section 106 legal agreement).
- 6.58 In accordance with The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), the application, if resolved to approve, must be advertised as a departure from the adopted LDP due to the non-compliance with policies GN.18 and GN.19, and referred to Council for final determination.

Annex

A.1 The Development Plan/Other Material Considerations

A.1.1 The Local Development Plan:

SP 1	Sustainable Development
SP 5	Visitor Economy
SP 12	The Settlement Hierarchy
SP 16	The Countryside
GN.1	General Development Policy
GN.2	Sustainable Design
GN.3	Infrastructure and New Development
GN.4	Resource Efficiency and Renewable and Low – Carbon Energy Proposals
GN.11	Conversion and Change of Use of Agricultural Buildings
GN.15	Small Scale Retail
GN.16	Visitor Attractions and leisure Facilities
GN.18	Touring Caravan and Tent Sites
GN.19	Static Caravan Sites
GN.22	Prior Extraction of the Mineral Resource
GN.37	Protection and Enhancement of Biodiversity
GN.38	Protection and Enhancement of the Historic Environment

A.1.2 Other material considerations/weight attached.

Planning Policy Wales (Edition 9)
Significant weight

TAN 4 (Retail & Commercial Development)
TAN 5 (Nature Conservation and Planning)
TAN 12 (Design)
TAN 13 (Tourism)
TAN 18 (Transport)
TAN 23 (Economic Development)
Significant weight

Planning Obligations SPG
Significant weight

Other material considerations described in this report
Significant weight

A.2 Consultation Responses

A.2.1 Head of Highways and Construction

Transportation

No objection subject to conditions and financial contribution towards pedestrian infrastructure improvements

Drainage

Recommend condition requiring surface water drainage details

A.2.2 Natural Resources Wales

Objection if non-mains foul drainage proposed (unless pre-conditions are met including that a formal application to connect to public sewer has been refused). Lack of capacity not a valid reason to justify non-mains foul drainage

A.2.3 Head of Public Protection

No objection subject to conditions

A.2.4 The Coal Authority

No objection subject to condition

A.2.5 Dwr Cymru Welsh Water

Object. Development would overload treatment works. No improvements planned.

A.2.6 Cadw

No comments (no impact on designated historic assets)

A.2.7 Dyfed Archaeological Trust

No objection

A.2.8 Council Landscape Officer

No objection – detailed comments and conditions recommended

A.2.9 Council Ecologist

No objection subject to conditions

A.2.10 Council Access Officer

Consideration should be given to access and accommodation for disabled

A.2.11 Kilgetty Begelly Community Council

Approval (subject to conditions highlighted by statutory consultees being met)

A.2.12 Local Residents

Two representations of objection from nearby properties:

- Noise and light pollution
- Disruption to amenity, character and scale adjoining property
- Would establish a precedent
- Highway safety hazard
- Over-development of holiday parks in Pembrokeshire
- Jobs will be seasonal and low paid

One representation of support:

- Sensitively designed / sustainable
- Economic benefits

Background Documents:

Copies of all the Background documents referred to in this report are available on the planning application file for inspection by Members of the Planning and Rights of Way Committee on request to the Planning Support Team.

- Consultation responses from Head of Highways and Construction, Natural Resources Wales, Head of Public Protection, The Coal Authority, Dwr Cymru Welsh Water, Cadw, Dyfed Archaeological Trust, Council Landscape Officer, Council Ecologist, Council Access Officer and Kilgetty Begelly Community Council
- Representations from local residents