

PLANNING STATEMENT AND JUSTIFICATION REPORT FOR PRE-APPLICATION CONSULTATION

PHASE 3: ERECTION OF A FURTHER 20 HOLIDAY
LODGES; MANAGERS/SECURITY DWELLING WITH
LINKED 'MEET AND GREET' OFFICE BUILDING';
CREATION OF AMENITY LAKE, LANDSCAPING AND
BIODIVERSITY ENHANCEMENTS

HEATHERTON WORLD OF ACTIVITIES, ST FLORENCE,
TENBY, PEMBROKESHIRE, SA70 8RJ

15th January 2021



Existing lodges and yurt development delivered from Phase II in 2016/17



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Application for Planning Permission

Town and Country Planning Act 1990

Head of Planning
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of Mr Charles Davies for the following planning permission:

1. **Proposal:** Phase 3: Erection of a further 20 holiday lodges; managers/security dwelling with linked 'meet and greet' office building; creation of amenity lake, landscaping and biodiversity enhancements
2. **Site location:** Heatherton World of Activities, St Florence, Tenby, Pembrokeshire, SA70 8RJ
3. **Type of Planning Permission:** Full
4. **Relevant LDP Policies:** SP1, SP5, SP16, GN1, GN2, GN3, GN4, GN19, GN20, GN22, GN26 and GN37
Biodiversity (2014); Parking Standards (June 2013); and Planning Obligations (2016)
5. **National Policy and Guidance:** Planning Policy Wales, Edition 10 (PPW) 2018
Technical Advice Notes 5 – Nature Conservation and Planning (2009); 6 – Planning for Sustainable Communities (2010); 12 – Design (2016); 13 – Tourism (1997); 18 – Transport (2007); and 23 – Economic Development (2014).

1.0 INTRODUCTION

1.1 Please find enclosed the following:

- **Planning Statement and Justification Report** (this document)
- **Application forms and associated certificate of ownership**
- **Drawing MP00:** Master Site Plan at Scale A2 @ 1:4000
- **Drawing P01:** Location Plan at Scale A3 @ 1:2500
- **Drawing P02:** Topographical Site Survey at Scale A2 @ 1:1000
- **Drawing P03:** Proposed Site Layout (Lodges) at Scale A2 @ 1:1000
- **Drawing P04:** Floor Plan and Elevations of Lodge Type A at Scale A3 @ 1:100
- **Drawing P05:** Floor Plan and Elevations of Lodge Type B at Scale A3 @ 1:100
- **Drawing P06:** Proposed Site Layout (Managers Dwelling) at Scale A3 @ 1:250
- **Drawing P07:** Floor Layouts of Managers Dwelling at Scale A3 @ 1:200
- **Drawing P08:** Elevations and Section of Managers Dwelling at Scale A3 @ 1:200
- **Drawing P09:** Elevations of Managers Dwelling at Scale A3 @ 1:200
- **Drawing P10:** Floor Layout and Elevations of Meet and Greet Office Building at Scale A3 @ 1:200
- **Appendix A – Business Plan/Overview**

- **Appendix B** – Justification Statement for Managers Dwelling/Meet and Greet Building
- **Appendix C** – Tree Survey and Impact Assessment by Paul Cleaver Tree Consultants (December 2020)
- **Appendix D** Ecological Survey by Kite Ecology (September 2020)
- **Appendix E** Photomontage of Existing Site Context
- **Appendix F** Planning Committee Report dated December 2016 and Decision Notice dated April 2017 in respect of Windberry Top Farm (Folly Farm), Begelly, Kilgetty
- **Appendix G:** Design and Access Statement
- **Planning fee** – £tbc

1.2 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 (May 2017)*.

1.3 This application is deemed a major application as is over 1 hectare. Having regard to the latest Environmental Impact Regulations, and to the scale and nature of development proposed and when in conjunction with other development, the proposal is not deemed to constitute a form of EIA development.

2.0 PREAMBLE

2.1 Heatherton (World of Adventures) is now a well-established and well-run family tourist attraction, located within a cluster of other tourist facilities a short distance from Tenby. Since the early 1990s the owners of the site have carried out significant investment, expansion and enhancement of facilities and which now provides a wide range of activities, support facilities and holiday accommodation.

2.2 Following a permission in 2014, the owners were able to provide a range of tourist accommodation on the site, in the form of luxury holiday lodges and two areas of glamping units on the northern part of the site. This new accommodation was introduced on a phased basis and now operate successfully from the site. These additional tourism facilities are operated as Florence Springs 'Luxury Lakeside Lodges' and 'Glamping Village' which form part of the wider Heatherton site. The site was awarded the 'Best Holiday Park in 2019 in the Pembrokeshire Tourism Awards.

2.3 The 2014 permission represented an initial phase of investment on the site. This included permission for 33 holiday lodges and significant areas for glamping with yurts. This current application represents a further phase of development which the introduction of a further 20 timber holiday lodges, to complement the existing provision and to further strengthen the business model. A small 'meet and greet' office building is also as part of the application, seen as an important ancillary facility to directly service the holiday accommodation section of the site and will replace a temporary cabin.

2.4 The applicants have also explained that there is now a desperate need for some form of effective security on the site. There has been a series of breaches of security and break-ins across the site over the years and these problems have only increased in more recent years. This problem was fully recognised by the police, even at the time of the 2014 permission.

2.5 Therefore, the applicants are also seeking permission for the erection of a managers/security dwelling on the site as part of the proposals. This would be appropriately located and fully integrated as part of the wider development of the site. It is intended that the dwelling would be occupied by close family members who currently in housing need and live either on the farm and/or away from the site and who are/will be taking a more active role in the running of the business in the future.

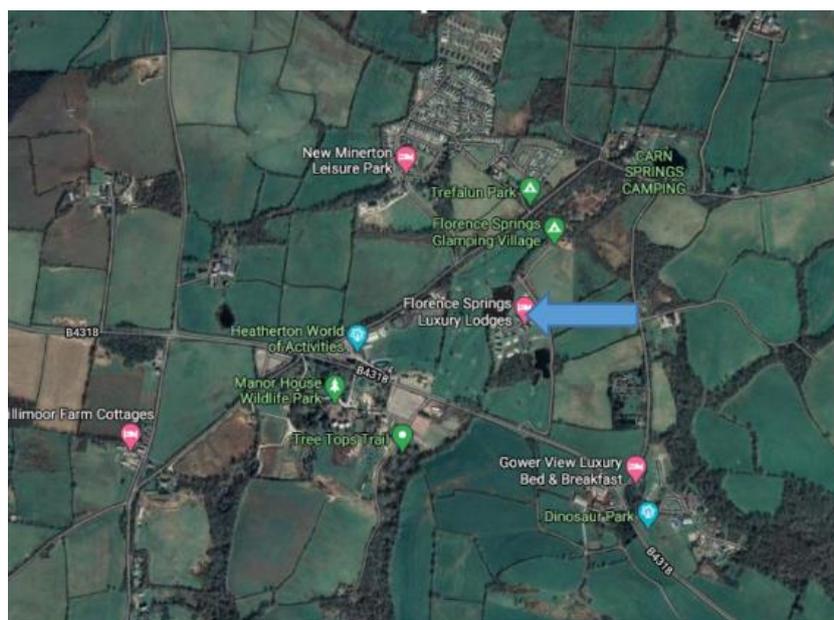
2.6 Unlike Folly Farm and Oakwood, Heatherton is a year-round attraction, open on 362 days of the year. The diverse range of activities, which is essential to its business model of 'free entry' and 'pay as you play' available, have been set out as part of previous planning applications and are fully set out on Heatherton's website and advertising material. As such, it is a key business in the tourism sector and one that fits with the ambitions of that sector to become an attractive and diverse year-round industry.

2.7 As a result of the economic investment, the impact on job retention and creation, and the boost to the tourism economy of Pembrokeshire, and given the limited visual and environmental impact of the development, it is concluded that this further phase of development should be supported by the County Council.

3.0 LOCATION AND DESCRIPTION OF SITE

Location

3.1 The application site is land at Heatherton World of Activities, a vibrant visitor attraction near St Florence, Tenby. Heatherton is based on a 125 ha (300 acre) dairy farm which lies about 4 kms to the west of Tenby and 5 kms to the east of Sageston/Carew with the land sloping southwest from a high point near Carn Rock. The attractive village of St Florence lies 2 kms to the south. Those parts of the farm lying outside the main visitor attraction are utilised for grazing and silage. The aerial photograph below shows the immediate context of Heatherton World of Activities and the application site.



Site Context – Source: Google Maps 2020

3.2 Heatherton has been a major tourist attraction in West Wales for almost 30 years with the main thrust of the business based on providing a variety of individual attractions involving physical activities and a range of excitements that appeals to a wide range of visitors from 3 years plus and with an emphasis on family groups. Heatherton includes in its on-site advertising the by-line “*World of Activities*”.

3.3 There are now over 30 activities available on site with Heatherton open all year round. There is sufficient space for over 500 cars in the two car parks, with the southern car park also accommodating 20 coaches. It attracts some 200,000 visitors a year.

3.3 The current vehicular access points to the site are from the B 4318 which runs between Tenby in the east to Sageston in the west where it joins with the A477 (T) between Carmarthen and Pembroke Dock. The more westerly access serves the northerly part of the site, which includes the main car park, sports park area and golf course. As part of the 2014 permission an existing field gate access was modified and upgraded to serve the proposed luxury holiday lodges and glamping site which have been successfully implemented.

3.4 The north western boundary is formed by the ‘C’ class road (Devonshire Drive) from its junction with the B 4318 towards Carn Rock. To the north of this road lie the Caravan and Holiday Home Parks of New Minnerton and Trefalun. There is open farmland to the north-east with the ‘C’ class road running parallel beyond leading via Wedlock Farms and the Dinosaur Experience to Carn Rock.

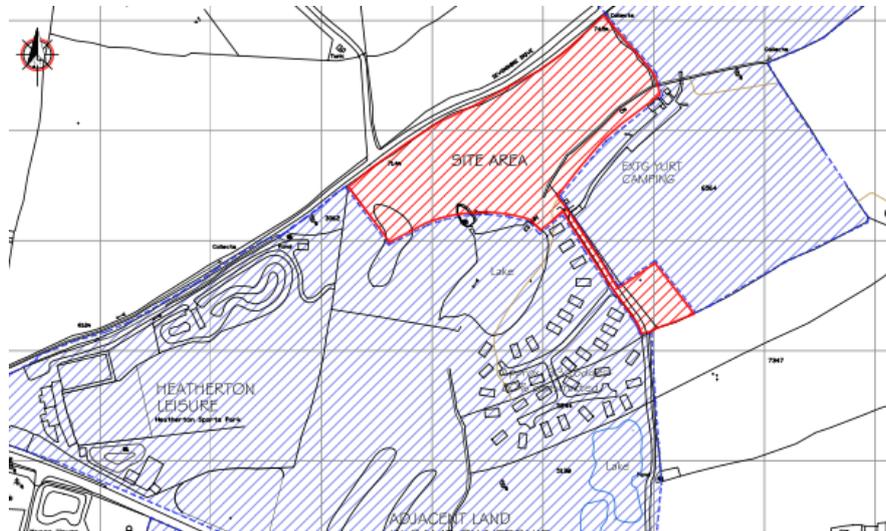
3.5 The B 4318 divides the northern half of Heatherton from a southern section; the two elements are joined by an underpass which allows safe movement by visitors and by operators’ vehicles required for management of the site - but not by visitors’ cars.

3.6 Vehicular access to the southern section is gained by a second access point on the B 4318 which leads directly to an overflow car and coach park. This part of Heatherton includes areas which are used for a variety of outside activities and the more recently constructed ‘Dragon Slide’ The south eastern boundary of Heatherton is delineated by a steep-sided valley through which the Tree Tops Trail has been constructed and paintball centre based and the south-western boundary by woodland and a stream which also drains to the south and subsequently to The Ritec. This area is the site of the Orienteering Challenge. The southern boundary lies parallel to a footpath from St Florence to Gumfreston. To the west of the site is the Manor House Wildlife Park.

3.7 Heatherton lies within a local cluster of large-scale tourist destinations together with The Dinosaur Experience, Manor House Wildlife Park and the attractive village of St Florence. Fronting Devonshire Drive and within walking distance are the large caravan and holiday home sites of New Minnerton and Trefalun. The wider setting generally comprises open fields with areas of woodland and sparse residential development.

Application Site

3.8 The application site is irregular in shape, has a total area of 3 ha and is located within that part of Heatherton which lies on the northern side of the B 4318. The Heatherton site has a total site area of some 63 ha on both sides of the road, set within a total land ownership area of some 125 ha which includes farmland.



Location Plan – Drawing P01

3.9 The main part of the proposal for the luxury holiday lodges would be on the northern section of the existing golf course. The site is boarded by Devonshire Drive to the north-west, an existing lake with holiday lodges (phases 1 and 2) beyond further to the south, and the two glamping sites to the north-east and south-east. There is an existing small watercourse which serves the lake which borders the site to the south-east, with the parking area and toilet block serving the glamping site beyond.

3.10 There is a high degree of tree screening along the Devonshire Drive boundary with the glamping area to the north-east being well wooded. Topography across the Heatherton site varies. That part of the golf course for the proposed luxury holiday lodges has a general fall of some 4 metres to the south-east from the site boundary down to the existing lake and watercourse.

3.11 The second main part of the proposal for the managers dwelling/meet and greet office building would be on small open parcel of land on the eastern side of the internal access road, opposite the phase 1 luxury holiday lodges. This site is slightly sloping with a fall to the south-west of some 2 metres. There is some post and wire fencing with some trees to the south-east, with a partly enclosed area containing a mast and some oil containers.

3.12 This part of the Heatherton site, which includes the existing luxury holiday lodges and glamping is served from a separate vehicular access off the B 4318. An existing field gate access was modified and upgraded as part of the 2014 permission and was constructed to required highway safety requirements.

4.0 BACKGROUND AND SITE HISTORY

4.1 Heatherton has now been running now for almost 30 years, by four directors including Mr Charles Davies. In the early 1990s the idea of Heatherton was borne out of the agricultural downturn driven by the introduction of milk quotas in the mid-1980s and the assistance of the farm diversification scheme in the 1990s. The diversification of the land began with the establishment of a driving range and 18-hole golf course on the land and subsequently through various planning applications over the years to become one of the major visitor attractions in Pembrokeshire.

4.2 There is an extensive planning history to this site, due to the needs of the business to continually invest and strengthen the site as a visitor attraction. The more recent and significant applications are set out in the following table:

Application Reference	Description	Decision
19/1188/PA	First floor extension, alterations and new main entrance to reception building	Granted 06/05/2020
18/0081/PA	Erection of Dragon slide attraction	Granted 28/06/2018
12/1105/PA	Provision of additional attractions and tourist accommodation in the form of 33 log cabins and 16 yurts.	Granted 22/05/2014

4.3 In May 2020, permission was granted for extensions and improvements to be made to the main reception and café building which is located adjacent to the main car park and 'sports park' area to the south-west of the golf course and work on this will be completed in 2021.

4.4 In June 2018 permission was granted for an additional visitor attraction, with a 'Dragon Slide' facility to be erected on some vacant land located on the southern side of the B 4318, to the south-east of the existing overflow car park and coach park. This was also close to a range of other outdoor facilities on this side of the road. This attraction has been successfully delivered and proved popular..

4.5 One of more significant applications in recent years was that granted in May 2014 (reference 12/1105/PA) which comprised the development of several additional attractions/activities together with the introduction of new holiday accommodation at the site. This application was an initial phase of a longer-term development strategy for the site and to enhance the status of Heatherton as a high quality and well-run family-oriented tourist attraction in the local area.

4.6 That application comprised the introduction of various phases of development, with the introduction of a total of 33 luxury holiday lodges and two areas of glamping in the form of yurts within the central and northern parts of the Heatherton site on the northern side of the road. These new facilities included a Hedge Maze, dog agility course and new attractions within the Kids Adventure Zone. The proposed zip line course is in the planning stage with the intention of introducing the attraction in the 2021/22 season.

4.7 As part of this comprehensive planning proposal, it also involved the modification and upgrading of an existing field gate access off the B 4318 to serve the proposed new holiday accommodation, with appropriate visibility splays provided to highway safety requirements; and put forward a long-term programme of site-wide refurbishments and improvements.



Photograph of the completed new entrance

4.8 The application was recommended for refusal by Council Officers but was approved by Members of the Planning Committee. Officers recognised that there were economic and social benefits of the proposal, that it would achieve environmental improvements, had no objection to the proposed additional outside activity areas; and that its impact on the landscape and amenities of the area were acceptable. However, Officers relied upon the strict application of Policies GN.18 and GN.19 which effectively restricts new holiday accommodation to within or well-related to a settlement boundary, and to outside certain community areas such as St. Florence. Further, on the basis of the evidence submitted, the business case and other benefits were not considered sufficient to justify a departure from local Development Plan policy as it applied to tourism development.

4.9 However, Members considered that there were significant material considerations which outweighed any policy objection. In particular, Members made reference to the significant economic benefits of the proposal, being supported by national policy and guidance; that the proposal was supported by then Pembrokeshire Destination Management Plan 2012-17; and that Heatherton formed part of a unique tourism cluster that was well-related and an acceptable extension to existing developments. It was also mentioned that there was a need to compete with other attractions across Wales.

4.10 These attractions have been delivered successfully including the provision of the yurts and the phased introduction of the luxury holiday lodge units. The latest phasing position in respect of the luxury holiday lodges and glamping is fully set out in the applicant’s Business Plan/Overview. The holiday lodge position is broadly illustrated on the plan below with 23 of the 29 completed and ordered lodges retained by the park and utilised on a rental basis. Six lodges have been sold as private holiday homes to self-finance the lodge park. The remaining 4 plots to be housed with 4 more rental lodges and retained by Heatherton.



4.11 The purpose of the 2012 application was to strengthen its role as an all-ear round visitor attraction and employer. It introduced a more diverse business model involving not only individual attractions but also high-quality accommodation where visitors could make use not only of the facilities located by Heatherton but also the surrounding attractions located within this cluster and immediate locality.

4.12 Through its continued investment, this family-run visitor attraction has become one of the most important tourist attractions in Pembrokeshire. At the time of the 2018 application, the submitted Business Plan set out that, in order to continue to provide the quality and range of attractions that tourists require, it was vital that this existing visitor attraction continues to invest and diversify. The range of facilities available was a key part of the business plan at Heatherton. It is necessary to continue to improve and expand the range of activities in order to provide incentives for visitors to return to the attraction.

4.13 The planning history of the site demonstrates the continued investment that has been made in order to maintain this important tourism asset in Pembrokeshire. One part of this latest scheme seeks to expand and provide a greater number and range of luxury holiday lodges at the site, increasing the overall number from 33 to 53 on the far northern part of the Heatherton site.

5.0 UPDATED BUSINESS PLAN OVERVIEW AND JUSTIFICATION STATEMENT

5.1 The applicant has provided an updated Business Plan Overview for Heatherton, since the two previous applications granted in 2014 and 2018 (see **Appendix A**) and justification statement (see **Appendix B**) for the provision of a managers dwelling/'meet and greet' office building to serve the development on this part of the site. A photomontage showing the location of the different elements of the proposed development and immediate site context is provided at **Appendix C**. These documents should be read in conjunction with the other application documents in support of the proposal.

Business Plan/Overview

5.2 This document provides a comprehensive and detailed background to the business, which sets out aims and objectives; a vision for the Park; an overview of the business; recent and future investments; employment opportunities; and environmental objectives. Some of the key points can be summarised below:

- Heatherton is one of Wales' leading family fun tourist attractions by providing sustainable all-year round activities for all ages and abilities, whilst co-existing and improving the natural environment.
- Florence Springs is the accommodation element of the business, currently offering a mixture of unique glamping facilities and luxury holiday lodges, located to complement one another.
- Heatherton at present is carrying out an effective business model with the first and second phase of the luxury lodge park and glamping village nearing completion. The lodge park at present has permission for 33 lodges, with 30 on site by August 2021 and the remaining 3 during 2022.
- In a working partnership with Hoseasons, where they carry out the marketing and booking process, the accommodation benefits from a high occupancy level with an average of just over 95% annual occupancy across the lodge and glamping business during 2020. The success of the rentals has allowed a steady reinvestment strategy, to allow the park to expand at a manageable rate.
- The all year nature of the lodges now make-up a larger proportion of income, making the park more viable and sustainable in the future, and supporting other elements of the business and employment levels.
- At present the accommodation draws between 65 and 70 families a week, across the lodge and glamping sites, a positive impact upon the tourist facilities and amenities in the surrounding area.
- Since the park opened in 1992 over £5 million of investment has been introduced up to 2012 and a further £6 million invested in the last 8 years, with a dedication to providing first class accommodation and further extending the attractions at Heatherton to boost the park appeal and customer experience.
- The provision of the lodges has been integral for the park's survival through Covid-19 and all of its restrictions, but further investment into the accommodation would provide a more viable future for the park. This would also secure the jobs of many employees particularly during the winter months.

- During 2019 and 2020 just over £2.5 million has been invested into the lodge park with 15 luxury lodges introduced including provision of infrastructure and landscaping. A further £1.75 million will be invested into the lodge park during 2021 and 2022 to complete the site.
- The hope is that the current proposal would bring in a further 40 families a week to the area. As of August 2021, a study estimates that Florence Springs could provide an economic boost of £900,000 to the local economy. The completion of phase 1 and 2 and the potential future expansion of 20 lodges could see the local economy gain from a further £690,000 each year, totalling £1,590,000 and together with the glamping village, could total £1,830,000.
- All the activities are introduced with environmental policies in mind, with eco-friendly structures and recycled materials being used wherever possible. Some thought is being given to the provision of a possible wind turbine in the future subject to viability.
- With the expansion of the lodges the director's feel that it is now essential that a manager's house is located within the park, for on-site services and security reasons (see below).
- The intention is to use the additional 20 lodges on a rental basis, unlike the first two phases which had a mixture of park and privately owned lodges. Previously, a few select lodges were sold in order to self-finance the project, whereas now the current business model now allows for steady reinvestment.
- Heatherton currently employs over 50 members of staff full time and just over 155 employees including part time. This equates to some 60 full time equivalent employees. The potential future expansion of the accommodation with a further 20 lodges would create further jobs in the way of 10 full time equivalents and would expand the marketing department with full time rather than part time employees.

Dwelling and Meet and Greet Office Justification Statement

5.3 The applicants have provided some background to the residential element of the proposal. They have explained that there is a need for a manager's dwelling on the site – in order to provide direct support for the running of the business which has expanded and diversified in more recent years; and for the need for increased on-site security.

5.4 The applicants have explained that although members have other dwellings (linked to farming) in the locality, these directly serve the farm and are away from the main Heatherton site. Whilst it is explained that all the directors will continue to be involved in the long term running of both the farm and Heatherton and will continue to live in their existing houses, the directors are now looking to slowly step back and allow the next generation to continue the running of the Heatherton business.

5.5 The accommodation is being sought for a director and/or one of their sons who have recently returned from university but unable to live close enough to assist with the warden and security issues of Heatherton, including the Florence Springs Holiday Lodges. There is a need for quick access for customer issues and emergencies. Hence, the inclusion of a 'meet and greet' facility for families arriving at the site.

5.6 They explain that as Heatherton and Florence Springs are located in a rural area, break-ins and burglaries have become a regular occurrence. The cases are referred to in the

applicant's statement. This has resulted in the police removing their alarm response from their system. Although the applicants have installed CCTV and other cameras around the site, problems have continued and the need for 24-hour security has therefore become a must rather than a need. On-site accommodation would also avoid the need for on-going and regular travel movements to and from the site.

5.7 At present Heatherton has no on-site accommodation. The Florence Springs part of the site is considered to be the most suitable area for this element of the proposals as it can closely tie-in with the guests who stay at the site rather than customers who are daily visitors to Heatherton and utilities are available. Other existing buildings and locations have been considered but these would not be suitable for accommodation or housing as they would have a detrimental effect on the operation of the business.

5.8 The success of Florence Springs has resulted in some 50 groups including 200 guests on average staying on the site at any one time. The applicants now believe they require accommodation on site to assist with the 24/7 nature of the business and allowing for quick access for customer issues and emergencies. The directors are currently situated at Heatherton Farm, some 1.5/2 miles away from the site which from a security point of view this causes impracticalities in both distance and speed of response, offering little or no deterrent to break-ins.

5.9 The applicants have clearly indicated that they would be happy for the dwelling to be tied and conditioned directly to the Heatherton site.

6.0 THE PROPOSALS

6.1 This further application proposal builds upon to the needs of the business to continually invest and strengthen the site as a visitor attraction, particularly in terms of the number and range of tourism accommodation that is available at the site. The application follows on from the 2014 permission which significantly expanded the range of tourism activities that were available at the site together with the introduction of luxury holiday lodges (to be built in two phases) and two further areas of the site to be used for 'glamping' in the form of yurts.

6.2 The first part of this application would involve the erection of a further 20 luxury holiday lodges, to be sited on land which forms part of the existing golf course on the far northern half of the Heatherton site. This would effectively represent a phase 3 of the introduction of the lodges onto the site and would represent a logical extension within the site. A Master Site Plan is provided on **Drawing MP00** which shows the current proposal in the context of past development.

6.3 It is also proposed to create a further amenity lake feature on the site which together with a series of biodiversity enhancements and landscaping, forms an integral part of the phase 3 development and to enhance the environmental qualities and setting of the site.



Overall Proposed Site Layout – Drawing P03

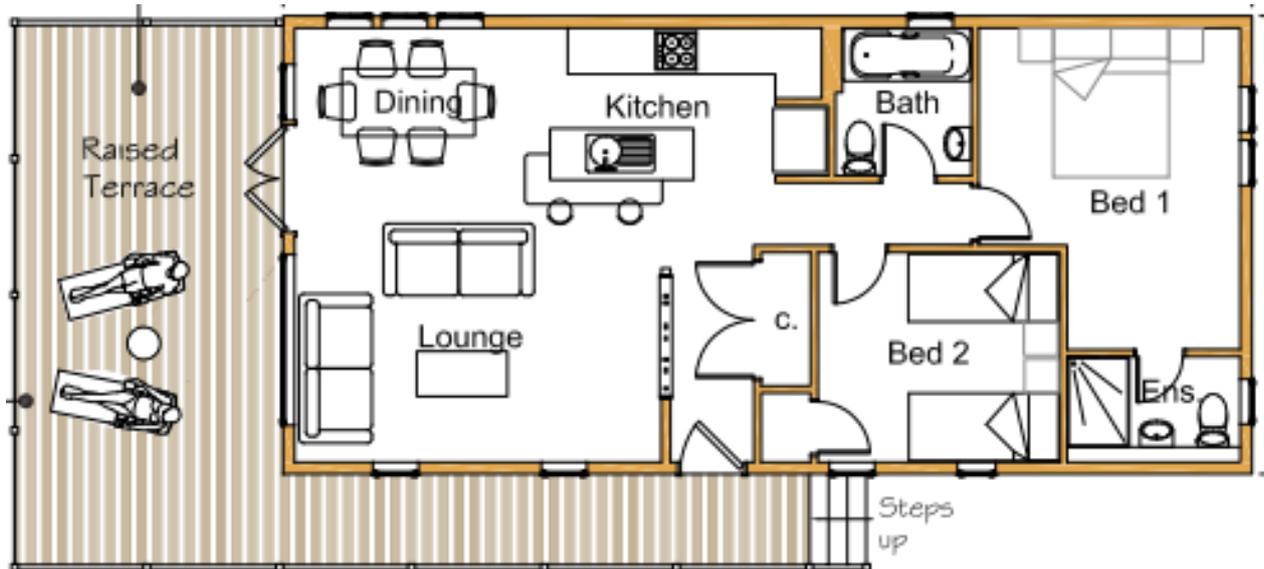
6.4 The second main part of the application would involve the erection of a managers dwelling with linked 'meet and greet' office building. This facility is proposed to be sited on an open parcel of land opposite the Phase 1 luxury lodge development. The applicant has explained the background to and justification for this element of the proposals. This essentially centres on the need for a permanent presence on the site due to serious and increasing security issues on the site, the change in family circumstances and the desire for a much improved and modern meet and greet facility to serve this part of the Heatherton site.

Luxury Holiday Lodges

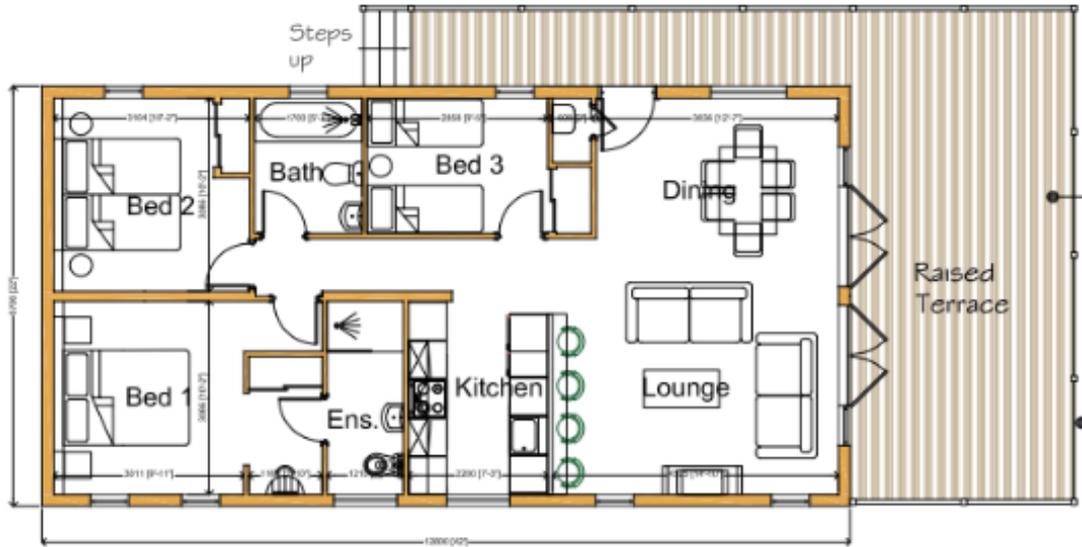
6.5 This part of the application would affect the northern part of the existing 18-hole golf course, with the removal of up to 5 golf holes and would form a logical extension to the north of the previously approved luxury holiday lodges. A total of 20 luxury lodges are proposed, sited and orientated to overlook an existing lake and a proposed new lake. The photograph below shows the location of the proposed holiday lodges (looking north over the existing lake):



6.6 Two different sizes and design of lodges are proposed, both with a high standard of self-contained accommodation. Lodge Type A would have 2 bedrooms with a floor area of 76.8sqm. Lodge Type B would have 3 bedrooms with a floor area of 85.76sqm. Their siting would be varied across the site. There would need to be some localised adjustment to topography in order to provide level ground for the lodges.

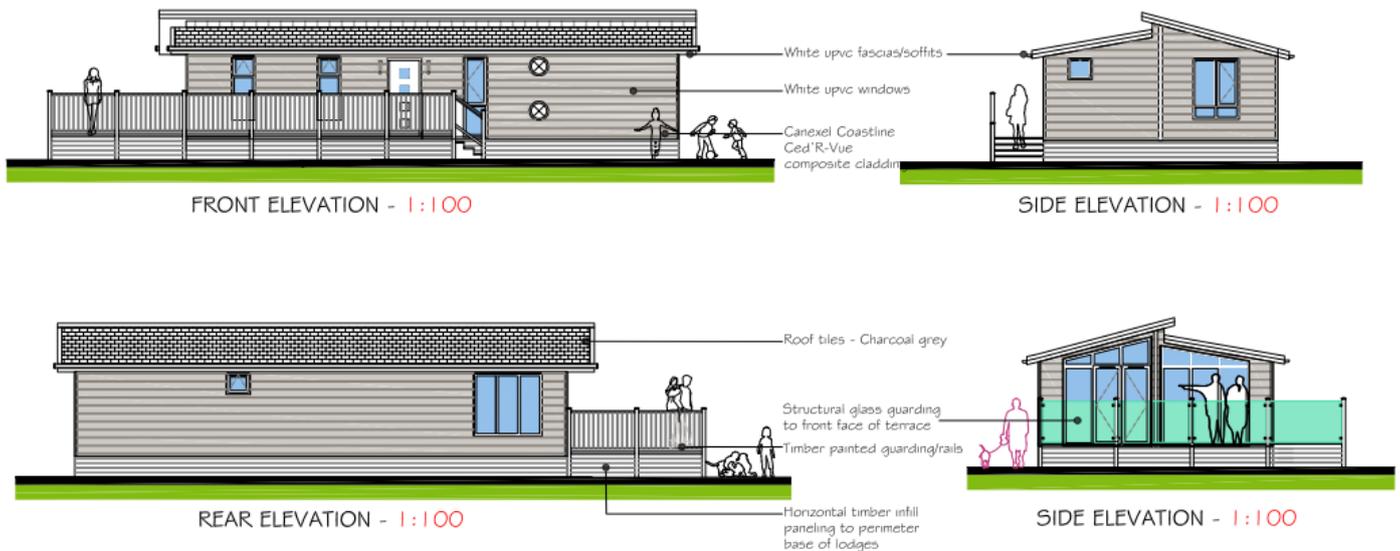


Internal Floor Layouts of Lodge Type A– Drawing P04

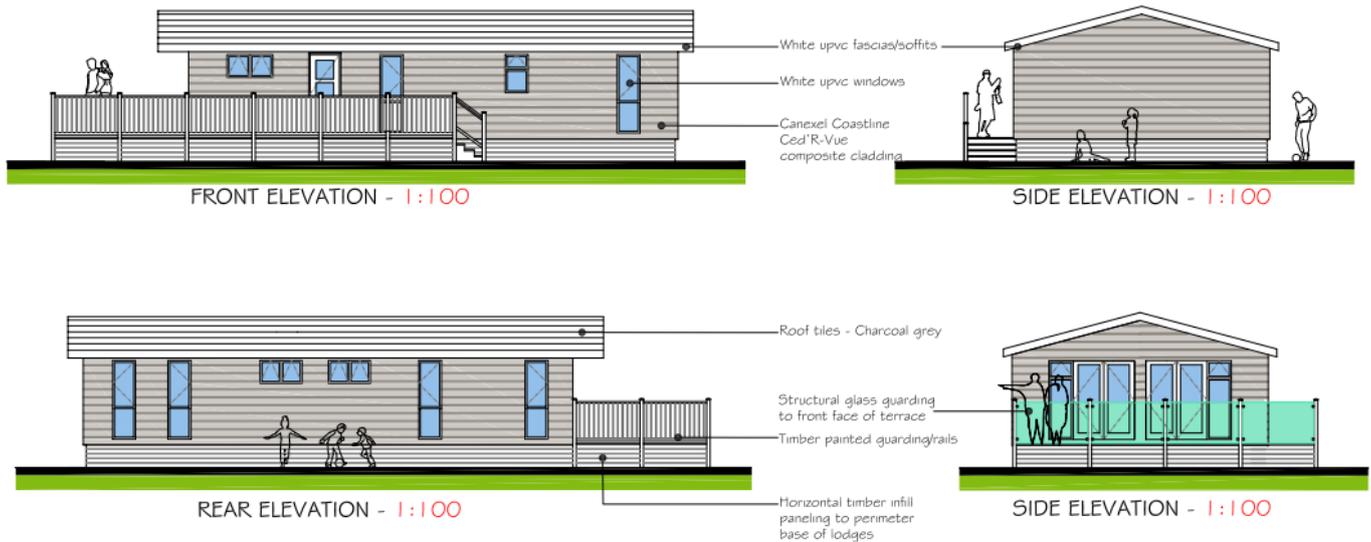


Internal Floor Layouts of Lodge Type B – Drawing P05

6.7 The proposed luxury holiday lodges would be of a similar design, but with a slight variation in roof design, and would be constructed in the same materials. The proposed lodges would be constructed using high quality materials with composite grey cladding to the walls under a plain tiled roof with uPVC fenestration and guttering. The main area of glazing would be to the front of the lodges, with level access out onto a raised decking area, enclosed by a combination of timber railings and a glass balustrade to the front, allowing clear views over the existing and proposed lakes. There would be horizontal timber infill panelling to the perimeter of the bases, thereby being set slightly above ground level.



Elevations of Lodge Type A – Drawing P03



Elevations Lodge Type B – Drawing P04

6.8 There would be an extension to the existing internal road which was provided to serve the new luxury holiday lodges and glamping as part of the 2014 permission, extending over the existing small watercourse. The access road would have a width of 5 metres with tarmac finish and gravel drainage strips to both sides. The proposed lodges would be accessed directly off these new two new access roads with parking for up to 2 vehicles on a permeable surface. A pedestrian footpath was created in 2019 which provided a useful link between the luxury lodge/glamping part of the site and the main part of the Heatherton activities site.

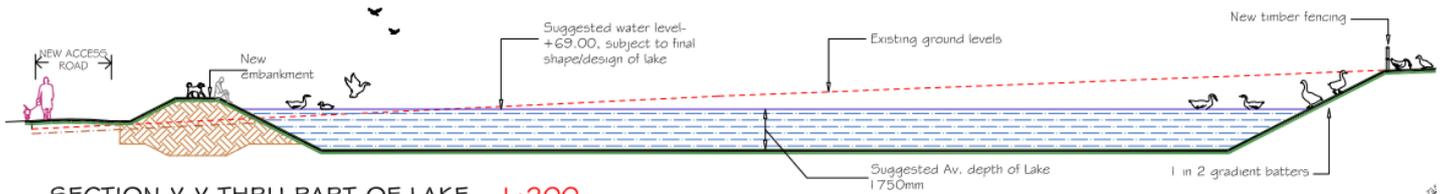
Lake

6.9 The submitted Site Layout Plan shows the location, size and indicative shape of the lake, subject to final design and level details. The lake would have an average depth of 1.75 metres, with perimeter banks shaped where required and a new embankment formed around the lower southern levels of the lake.

6.10 A grassed communal amenity area is to be provided on the south-east side of the lake with suggested timber post and timber fencing between the proposed lodges and the lake.

6.11 The existing stream/ditch is to be linked to the new lake towards the north-east with a new overflow ditch formed at the lower end of the ditch, including timber walkway and railings over.

6.12 Typical sections through the proposed lake and proposed embankment, together with a method of construction statement for the proposed earthworks are provided on Drawing P03.



Typical section through lake – Drawing P03

6.13 In terms of landscaping/ecology, existing zone of tree planting within the central part of the golf course would be removed and replanted elsewhere where feasible. An existing zone of tree planting to the south-west would be cut back in order to accommodate lodge 11.

6.14 The proposal would involve new areas of infill tree planting along the north-western boundary to Devonshire Drive, a new area of low-medium cover located towards the far north-eastern corner of the site, with the scope for some additional planting in the vicinity of lodge 12.

6.15 The application is accompanied by a detailed Ecological Appraisal and which includes a series of ecological enhancements, partly linked to the construction of the lake. The proposed landscaping areas would provide foraging areas for wildlife. The measures include the provision of a series of bird and bat boxes along the treed north-western boundary of the site. Low level lighting bollards are proposed along the access roads.

6.16 It is intended that use would be made of the existing drainage arrangements. Surface water would be to the nearby stream and lake. Foul waste would be directed into the site's existing sewerage treatment plant.

Managers Dwelling/Meet and Great Office Building

6.17 This part of the application relates to a small section of a field located on the eastern side of the internal access road, opposite the phase 1 lodge development. The photograph below shows the broad location of the proposed dwelling and 'meet and greet' office building:



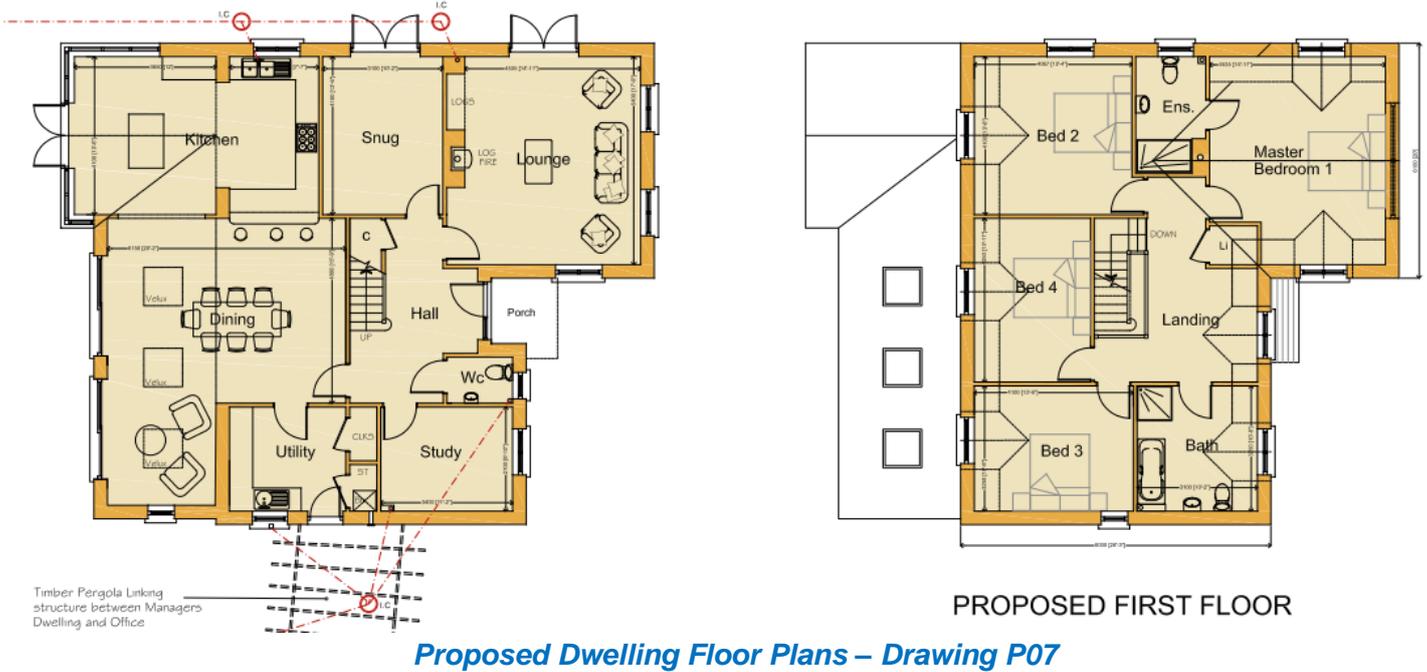
6.18 The proposed building would be sited centrally within the site with its front elevation facing south and the linked office building sited closer to the road frontage.



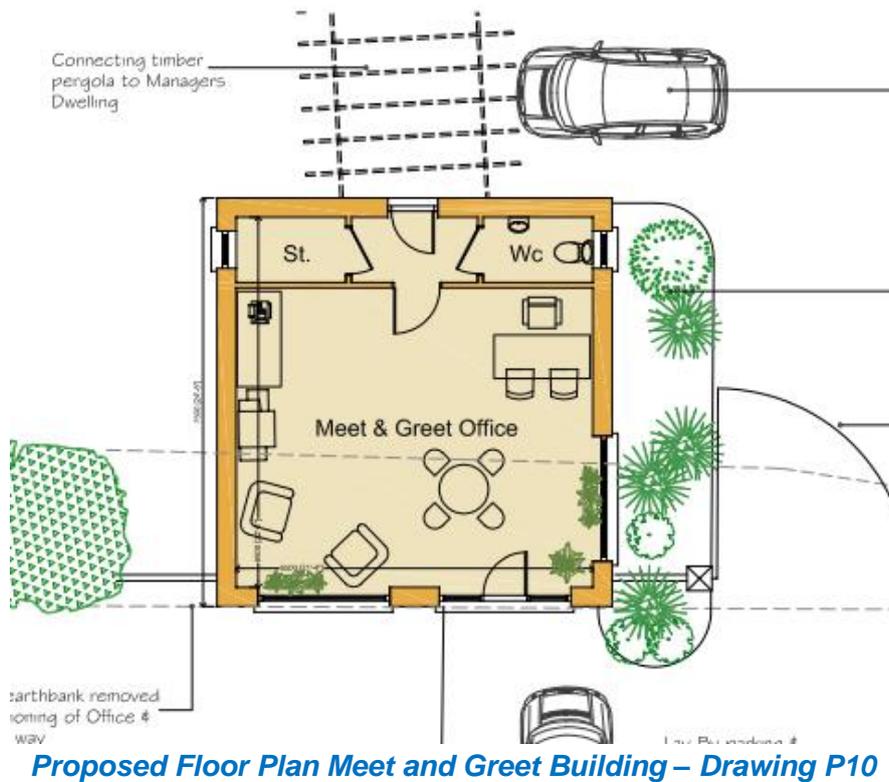
Proposed Site Layout Plan – Drawing P06

6.19 A new access and pick up point would be provided across an existing wide grass verge, with a parking/turning area serving the dwelling. The area containing the existing mast and gas tanks and its associated access would be retained (with the re-siting of one of the tanks).

6.20 The proposal would provide a 4-bedroom detached dwelling with a GIA of 244 sqm. The dwelling would have a height to eaves and ridge levels of 4 metres and 7.5 metres respectively.



6.21 The proposal also includes the provision of a ‘meet and greet’ office building (replace existing portacabin), linked to the side of the dwelling by a simple timber pergola. The building would have a floor area of 56 sqm with a height to eaves and ridge levels of 2.2 metres and 5 metres respectively.



6.22 The front driveway area would be in permeable surfacing with a modest paved patio area to the rear. The remainder of the site would be laid to lawn. The different building elements would be set at different floor levels to reflect the slope of the land.

6.23 The proposed dwelling with adopt an L-shaped plan form with a single-storey section across the rear elevation. The external materials would be painted smooth render under a composite blue/black slate roof covering with uPVC or metal fenestration and guttering. The design would feature a low eaves with modest dormers set at eaves level. The design of the dwelling incorporates grey composite horizontal cladding to the upper floors, reflecting the materials used for the proposed luxury holiday lodges. The single-storey rear section would feature a zinc standing seam roof covering. The linked office building would be of similar materials with sections of render and cladding. The drawing below illustrates the relationship between the two elements in context and to adjustment to ground levels.



South-East Elevation – Drawing P09

6.24 The existing hedge banks and trees along existing boundaries would largely be retained with new hedge bank and tree planting proposed to the more open eastern and northern boundaries of the site – both to provide appropriately defined boundaries and security. Additional 1.5 metres high timber fencing is proposed around the mast.

6.25 Local connection can be made to main water. In terms of drainage, foul waste would be to a treatment plant/septic tank located some 8-10 metres away from the dwelling. Stormwater and surface water would be to soakaways, subject to SUDs/SABS approval.

Access

6.26 The proposal would make use of the existing vehicular access onto the B 4318. We do not believe that any modifications are required to be made to this access or the first section of the internal access road. The existing access arrangements are deemed to be sufficient to support the modest level of additional traffic likely to be generated by the proposed development. The photograph below shows the existing vehicular access to the site from the B 4318:



7.0 PLANNING POLICY ASSESSMENT

National Policy

7.1 While *Planning Policy Wales: Edition 10* (PPW) published in December 2018 provides the overarching policy framework against which all planning applications are determined, Technical Advice Notes (TANS) also provide more in-depth guidance on specific topic areas. The following therefore represents an assessment of the proposal against the requirements of the two relevant documents in terms of new tourism-related development in the countryside.

7.2 The key focus is on achieving sustainable development which is defined as follows:

'...the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.'

7.3 It seeks to achieve well-being through the concept of 'placemaking' which considers the context, function and relationships between a development site and its wider surroundings, whilst being focused on positive outcomes.

7.4 In Section 5.5 on Tourism it states the following:

'Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales.'

‘The planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities.’

‘In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment.’

7.5 In Section 5.6 on Rural Economy it states the following:

‘A strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new enterprises and the expansion of existing business is crucial to the growth and stability of rural areas.’

‘New development...should generally be located within or adjacent to defined settlement boundaries’ and ‘...some industries may have specific land requirements which cannot be accommodated within settlements.’

7.6 The level of investment proposed by this proposal would ensure the long-term growth and success of this important tourism facility.

7.7 Due to the location of the site and the business need, there is a clear location restriction associated with the proposal. The site selected is considered logical and complies with the locational requirements for small businesses in rural areas, in that it comprises an extension to an approved tourism facility and would form an integral part of that facility.

7.8 Section 6 deals specifically with the natural and historic environment. For the reasons set out later in this statement and supporting documents, the details of the proposal has had full regard to the special and unique characteristics and intrinsic qualities of the site and surrounding area.

7.9 TAN 12 identifies the key considerations concerning design, for example, the impact of any development on surrounding buildings and/or the wider natural environment. Due to the location, scale and nature of the development it is considered to have little local visual or amenity impact.

7.10 Whilst TAN 13 is the relevant technical advice note to consider tourism-related developments, it is somewhat dated. For example, it does not take into account the significant growth in and for the different type of and increased standard of accommodation that is often required by the population. However, a series of general considerations are noted in that the current proposal is for an extension to an approved static caravan site (in the form of luxury holiday lodges) and which would continue to provide a high-quality accommodation offer on the site.

7.11 TAN 23 recognises that the planning system plays an important role in supporting the delivery of sustainable rural economies and business. This advice note provides clear support for the development, which seeks to provide a modest expansion to a previously implemented and successful scheme, would offer further economic advantages to the wider

community both in terms of significant local investment, job creation and attracting more visitors to the area. There are clear economic and employment benefits of the proposal, as outlined in the applicant's business plan/overview.

7.12 Therefore, the proposal meets the overall aims and objectives of relevant national policy and guidance in respect of tourism development.

Local Policy

7.13 The site falls within the administrative area of Pembrokeshire County Council (PCC). The County Council adopted the Local Development Plan (LDP1) for the area of the County outside the National Park on 28 February 2013.

7.14 The most relevant policies identified are SP1, SP5, SP16, GN1, GN2, GN3, GN4, GN19, GN20, GN22, GN26 and GN37.

7.15 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the statutory Development Plan for the area, unless material considerations indicate otherwise.

7.16 The application site lies within countryside and outside of any defined settlement boundary, including St. Florence which is located a short distance to the south of the site. The site is not subject to any specific nature conservation or landscape designations and is not within an area of flood risk. No historic assets would be affected by the proposal.

7.17 The County Council is in the process of working on a Replacement Local Development Plan (LDP2) to cover the period up to 2033. Although the process has only reached the Deposit Plan stage, the later stages of the LDP Review have been significantly delayed due to Covid-19. The Council has recently published a new Delivery Agreement timetable which states submission to the Welsh Government in July 2021 and possible adoption not until Summer 2022. Therefore, little weight can be given to the emerging Plan at this stage.

7.18 Notwithstanding the above position, the emerging Plan provides an indication of its direction of travel. Whilst the site would still be subject to countryside policy, the Plan states that one of its key objectives is to continue to sustain and enhance the rural and urban economy. There is a recognition that tourism accommodation is changing and there is a need to take this into account, including where new sites can be located and/or where existing sites can be extended. As such, it indicates that tourism policies are drafted to introduce flexibility over the plan period. This is fully reflected in Policy GN.44 relates to Caravan, Camping and Chalet Development – both new and extension to existing sites. It states the following:

'A. New medium or large-scale self-catering proposals including caravans and chalets will be permitted where:

- 1. They are immediately adjacent to service villages, service centres or towns:*
- 2. Where they are in locations deemed acceptable in landscape capacity impact terms.*

B. New small-scale self-catering proposals including caravans and chalets will be permitted where they are in locations deemed acceptable in landscape capacity terms.

C. Extensions to existing sites will be permitted where their scale is acceptable in landscape capacity terms and where the scheme delivers environmental enhancements.

In all cases, appropriate landscape mitigation measures in accordance with guidance must be provided.'

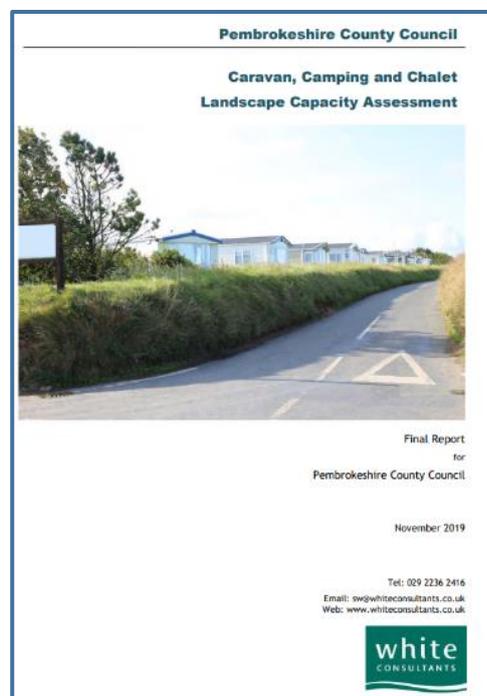
7.19 This is considered to be an important shift in policy, being far more flexible and far less prescriptive than the existing Policy GN.19. The new policy assessment is therefore to be based more upon the ability of the capacity of the landscape to accommodate the scale and form of development proposed, together with its landscape impact (both in terms of cumulative and more local visual impact considerations). A supporting paragraph states the following:

'The tourism offer in Pembrokeshire should be a quality sustainable provision, which gives visitors an outstanding experience and maximises the tourism that tourism brings for local communities, whilst minimising potentially adverse landscape and other environmental impacts...This complies with PPW's sustainability principles which seek to reduce the need to travel and support existing services.'

7.20 We believe the proposal would be in full accordance with this important emerging tourism policy. The proposal would represent a modest extension to the existing tourism accommodation range available at Heatherton and would be acceptable in landscape capacity terms. It would represent a sustainable form of development.

7.21 The above emerging policy is supported by a Caravan, Camping and Chalet Landscape Capacity Assessment, which forms part of the evidence base to the LDP2 and will be transferred into a formal SPG to support the Plan. It was issued by the County Council in November 2019. Essentially, it provides advice on a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated.

7.22 The current proposal is considered to fall within the 'static medium' size category of development (sites up to 3 ha). The site lies within LCA 20 which includes a large area to the north of St. Florence, which includes areas around Sageston, Redberth and Reynalton (known as the Jeffreyton Lowlands). This is considered to have a medium landscape sensitivity for the type of development proposed. The area to the immediate south and south-east of St. Florence is in the high category.



7.23 The document describes the value of the area lies in its role as a setting to the National Park, with an undulating landscape of rolling hills and ridges with open skylines in places. The Summary of capacity states the following:

‘As an extensive area, there is capacity for further development. However, parts have already reached capacity including the area around New Hedges close to National Park, and around Broadmoor. The capacity of the area lies away from the coast in flatter areas in either gentle valleys or on gentle plateau with existing overgrown hedges and trees to integrate the development and avoid overlooking. New sites or the extended sites are likely to be near main road corridors through the area, but development should not be apparent from the roads, apart from discreet signage,.’

7.24 It goes on to identify there to be capacity for extension to existing sites, although limited capacity along the A477 and A478 corridors it states... *‘There may be potential for expanding existing sites elsewhere but not where new development would overtop skylines or locate on exposed or steeper slopes visible to the wider landscape.’*

7.25 The proposal would fall within much of the siting and mitigation guidance set out in the document, in that the proposal would:

- Be sited in areas enclosed by landform, trees or mature hedges both within and adjacent to a site;
- Be sited away from the coast and would not affect skylines;
- Be sited adjacent to modern development, as part of the Heatherton World of Activities;
- Avoid encroachment into the open countryside and would not impact upon national or locally designated nature conservation sites;
- Be designed at a relatively low density with the use of luxury holiday lodges with ample green space, landscaping and a large water feature provided within and around the site;
- Adopt an interesting informal layout with the proposed units designed to minimise their visual impact.

7.26 This is an important document which provides clear advice and guidance in the assessment of the location of new tourism development within the County. We contend that the proposal would fully comply with this document and is a highly material planning consideration.

7.27 In relation to the adopted LDP 2013, Figure 2, which forms part of the Introduction to the LDP, is headed “*Relationship between Issues, Objectives, Policies and Monitoring*”. In the context of a tourism related development, the following extracts are appropriate:

- Key Issue as - *A strong urban and rural economy.*
- Objective as - *Developing a quality visitor economy founded on a distinct sense of place and an outstanding natural and built environment.*
- Sub-Objective as -
 - *To encourage development that complements the natural and built environment.*

- *To improve the range and quality of attractions and accommodation*
 - *Delivered by Policy Approach as - Criteria based policy on tourism proposals which enables appropriate new development to take place and allows for the upgrading of existing facilities.*
 - *Key monitoring outcomes as - A range of holiday accommodation and attractions are available to meet the different needs of visitors.*

7.28 The proposals described in this application should therefore be considered in the context of the Key Issues and Objectives of the LDP1 as described above and the relevant policies applied to this application as discussed below.

SP 1 Sustainable Development

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

7.29 The proposal would result in further significant investment in an existing tourist attraction, providing additional luxury lodge accommodation to supplement the range already available and planned, and builds upon the accommodation subsequently provided as part of the 2014 permission. This would support an existing and well-established facility and avoid the need for new smaller facilities in the open countryside elsewhere. Forming an integral part of the existing Heatherton site and tourism cluster, it is considered to represent a sustainable location for such development.

7.30 The proposal would provide a further welcome boost to the tourism sector in Pembrokeshire, not only support the immediate cluster of tourist attractions but others in the local area, and the nearby tourist centres of Tenby, Saundersfoot and others. As part of the business plan/overview outlined earlier in this statement, the applicant has indicated that in addition to safeguarding existing jobs, the proposal would create an additional 10 full time equivalent jobs with a further investment of a further £1.75 million into the site and generating a further £690,000 into the local economy.

7.31 The social benefits would arise from the continued and increased use of the facilities at Heatherton, but also at the other surrounding attractions, which encourage physical activity and exhilaration. Other benefits would arise from the proposed new dwelling in that it would result in increased security at the site and put less pressure on local police resources.

7.32 The applicant has had full regard to the environmental constraints and natural features of the site. There would be a small countryside 'land take' with the proposed dwelling unit with the proposed lodges being sited on part of the existing golf course, with little if any visual impact upon the wider landscape. The proposal would provide significant biodiversity enhancements in accordance with national policy and guidance.

7.33 The proposal would therefore achieve economic, social and environmental benefits in accordance with the above policy, but also the PPW as outlined earlier in this statement.

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.

7.34 The proposed location is necessarily adjacent to the existing facilities and attractions at Heatherton. Whilst this is a countryside location, the proposal would largely fall within the confines of the existing site and would form part of the collection of visitor facilities in this part of the B 4318 corridor. More specifically, it would contribute to the diversity and quality of accommodation on site and its offer to visitors to the area, in accordance with national advice as set out within PPW.

7.35 As the sub-text to policy SP5 states '*the visitor economy is now one of the most significant drivers of the local economy*' in Pembrokeshire. This proposal would provide a significant investment in the tourist economy. Furthermore, the proposal would support the existing facility, which in turn provides vital support to the policy ambition to create '*a strong and diverse year-round industry based on a high-quality destination which visitors will want to revisit*'. Therefore, the proposal would comply with the above policy.

7.36 The development of superior luxury holiday lodges based around the existing lake and a proposed new lake and located close to the existing golf course would meet a need for high quality self-catering accommodation that is in short supply within Pembrokeshire. The existing lodge development has been very successful since their phased implementation since 2014 with final completion in the near future.

7.37 Proposals for extending the range of attractions at Heatherton would not only assist in encouraging existing visitors to return but is likely to attract a wider range of holidaymakers and new visits from people already living in Pembrokeshire. A stronger Heatherton would increase the attraction of the whole of Pembrokeshire in an increasingly competitive holiday and corporate/sports market.

7.38 The proposals would benefit the local communities of St Florence, Tenby and Saundersfoot as visitors staying at the lodges are likely to purchase food and other day to day requirements from the local stores or will want to eat in the various pubs and restaurants in the area.

7.39 Heatherton, already a significant employer, and the proposal would generate an additional 10 jobs as a result of the proposed investment.

7.40 It is also considered that investments at Heatherton, which already forms a cluster with Manor House Wildlife Park, new numerous caravans parks and Great Wedlock Dinosaur Park, is a more sustainable form of development. Visitors can enjoy a variety of activities with little or no additional driving which is not only due to this clustering but because of Heatherton's pricing policy which involves paying for each attraction rather than paying a single entrance fee at the door thereby giving greater flexibility to visitors.

7.41 The proposals have been located and designed to reflect the environmental qualities of the site both in terms of the landscape and associated ecology around and within the application area.

SP 16 The Countryside

The essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. Development which minimises visual impact on the landscape and relates to one of the following will be promoted:

- 1. Enterprises for which a countryside location is essential;**
- 2. Opportunities for rural enterprise workers to be housed in suitable accommodation that supports their employment; and**
- 3. The re-use of appropriate existing buildings.**

7.42 The application site is in the countryside. However, this location is essential to the ongoing enterprise at Heatherton World of Activities. An alternative location away from the existing facility would be both unsustainable and uneconomical. The chosen location is largely within the confines of the Heatherton site and is considered to represent a logical extension of the existing tourist accommodation at the site.

7.43 The introduction of housing into the countryside is normally considered to be contrary to the overall development strategy of the local Development Plan, often being directed to more sustainable urban locations. However, the proposed dwelling is required in order to support the essential requirements of the applicant who lives and works in the countryside, and there is an identified and urgent need for a manager to live on site. This is required for security reasons and to assist in the on-site management of this site which has expanded significantly in more recently years. The on-site circumstances are therefore quite different from the early years of the business. As all the existing buildings at Heatherton are fully utilised for various purposes, there are no suitable buildings available for potential re-use. Therefore, suitable accommodation in a new building is required to support the business.

7.44 For the reasons set out elsewhere in this statement, the proposal would protect the landscape and natural environment of this part of the County.

7.45 Therefore, it is argued that the proposed residential element could potentially be in accordance with this policy, which is submitted to give support a well-established and family-run rural enterprise.

GN.19 Static Caravan Sites

A Proposals for new static caravan and chalet sites or extensions to existing sites by an increase in the number of pitches will be permitted where:

- 1. The site is within the Settlement Boundary of a defined settlement:**

B The enlargement of the area of a static caravan or chalet 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 Upgrading of touring pitches to static pitches will be permitted where:

- 1. The site is well related to a settlement identified in the hierarchy as a Service Village Service Centre or Town:**

2. **The site is well-related to a Local village, and will provide a community facility not present within the existing settlement, and**
3. **In all cases the following should apply:**
 - (i) **There is no overall increase in the number of pitches; and**
 - (ii) **There would be a demonstrable overall environmental improvement both for the site and its setting in the surrounding landscape; and**
 - (iii) **The site is outside the Community Council areas of Amroth, St Florence, East Williamston, Penally, Saundersfoot and St. Mary out Liberty.**

7.46 Policy GN19 supports the extension or intensification of existing chalet sites, including an increase in the number of pitches, subject to meeting certain strict criteria. It is accepted that Heatherton lies within the area of St. Florence Community Council and the site does not lie within or immediately adjacent to the village of St. Florence, however, the village is within easy walking or cycling distance of the site. However, as with the previous 2014 permission which included the introduction of new lodge accommodation, the following material considerations justify a further exception to this policy:

- Heatherton is a major tourist attraction with some 200,000 visitors a year and it is important that such an important player in the Pembrokeshire economy continues to deliver an exciting venue.
- The proposed additional luxury lodges should to be considered as both as an expansion of the existing high-quality lodge accommodation but also as part of the overall Heatherton experience.
- There is a trend for tourist destinations which combine both accommodation and attractions, for example the Centre Parcs model or more locally Bluestone, to appeal to those families which are looking to enjoy a holiday which involves a rest from driving but with opportunities to walk or cycle to other local attractions including shops and pubs. Such holiday opportunities tend to attract the A, B and C1 groups and the corporate sector, with their corresponding spending power in the local area.
- The visitor market is becoming both more demanding in terms of the quality, variety and innovative nature of attractions. A successful business must be receptive to that changing demand and making appropriate provision.
- Historically, Heatherton generated half of its income in just two months during the summer season. This proposal, as described in the accompanying Business Plan, would both allow a more structured approach to income generation and employment growth throughout the year.
- There have been comparable instances in (south) Pembrokeshire where other material considerations, including the economic benefits that will accrue to the local economy, have permitted the development of a mixture of attractions and on-site accommodation including Bluestone, Herons Brook and Trefloyne Golf Club. Later in this Statement, specific reference is made to a large tourist development at Folly Farm granted by the Council in April 2017.
- The comprehensive landscaping scheme has been designed not only to deliver a single vision for the site but to retain and even enhance the ecology of the immediate area.

7.47 Although part of the emerging LDP2, we have already made reference to a significant shift in the approach towards tourism development, with Policy GN. 44 indicating a more flexible approach. The proposal would comply with this policy. This shift in policy adds weight to the merits of the current proposal.

7.48 Tourist destinations which combine both accommodation and attractions are appealing to those families which are looking to arrive and park and enjoy a holiday which can involve no further driving and with opportunities to walk or cycle at Heatherton or to other local attractions including shops and pubs. With the emphasis on *The World of Activities*, Heatherton can promote such inclusive holidays and increase its attraction for both the family holiday market and the corporate sector.

7.49 It is intention of national policy to ensure that units of holiday accommodation, in this case luxury lodges, are only occupied for holiday purposes and not as sole or primary dwelling houses or used as second homes. Therefore, the applicant is willing to accept a condition of occupation similar to that which was imposed on the 2014 permission for a similar range of holiday lodge accommodation at the site.

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 development.**

7.50 The supporting text states that the Council is keen to see improvements that would increase the quality of the tourism offer provided in a way that does not harm the environment and landscape or impact negatively on facilities located in nearby settlements.

7.51 The application proposals include a 'meet and greet' office building facility to be provided within the site, close to where it would serve the existing and proposed timber holiday lodges and existing areas of glamping. The glamping site already has access to a toilet/shower block adjacent to its parking area. The proposed building would be modest in size and scale and would provide a further enhancement to on-site facilities, and to visitors to this part of the Heatherton site. Such a facility is often expected to be provided in today's holiday environment in providing a high standard of accommodation facilities.

7.52 The proposal would simply provide a reception and office area. As there would be no retail facilities it would not affect other tourist or retail facilities in the area. The proposed siting and design would be sensitive to the locality, being a modest single storey building and which would be built to current building standards. An existing storage building on the site frontage, which is not suitable for the proposed use, would be removed. The proposed building would incorporate sustainability principles, such as in terms of a modern construction and drainage arrangements together with proposed landscaping as part of the wider development.

GN.26 Residential Development

Residential development will be permitted where the proposal is for one or more of the following:

- 1. Open market housing or affordable housing to meet local needs, located within the Settlement Boundary of a Town, Service Centre, Service Village or Large Local Village as defined in the settlement hierarchy;**
- 2. Affordable housing to meet local needs, located within the boundary of a Small Local Village;**
- 3. The replacement or sub-division of an existing dwelling;**
- 4. The conversion of an historic building to residential use; or**
- 5. A rural enterprise worker's dwelling.**

7.53 The overall aim of the policy is to direct new residential development within the defined settlement boundaries, as these are more sustainable locations with good access. The nearby village of St. Florence is defined as a Service Village in the Hierarchy which offers a good provision of services and facilities to meet the day to day needs of its population but plays a more limited role for the wider population.

7.54 Part of the application proposals involve the erection of a single manager's dwelling on the site. Its provision has a very specific purpose – to provide suitable accommodation for an on-site manager to support the running and security of the business. Although the proposal would fall outside any defined settlement boundary and could be argued not to fall within any of the above categories, the proposal would not be sited in a remote rural location but as an integral part of the Heatherton site. An important objective of this part of the proposals is to support an existing, well-established and successful family rural enterprise.

7.55 The applicant has put forward material considerations in support of this element of the proposals and which are deemed to outweigh any conflict with countryside policies of restraint.

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; and**
- 9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development.**

7.56 We consider the proposal, by reason of its location, siting and scale of the development, would be compatible with the capacity and character of the area within which it is located. The proposal would be well integrated into the existing development on the site and which would represent a modest extension of the existing accommodation provision.

7.57 The overall design concept is to build upon the first two phases of the introduction of modern and high-quality accommodation at Heatherton and to support the all-year round operation of the facility, whilst fully respecting the landscape and ecology qualities of the site and locality. These include taking into account the attributes of the site which comprise its landform and well screened setting, a lake and other water features, woodland and hedgerow features and views within the site.

7.58 In view of the siting of the proposal and having regard to the local topography and surrounding trees and boundary vegetation, there would be no material visual impact beyond the site boundaries and would not be readily visible from any nearby public rights of way. There might be glimpsed views of the proposed luxury lodge development to users of Devonshire Drive which borders the site to the north-west, particularly during the winter months of leaf fall. However, any visual impacts would be very localised and limited. Further, supplementary planting is to be provided along this boundary to provide additional and more effective screening of the development.

7.59 The site is neither in nor close to the Pembrokeshire Coast National Park but is centred on an existing and major tourist destination which itself forms part of a cluster of attractions and holiday accommodation set within the rolling landscape in the St Florence area.

7.60 The scheme and scale parameters have been designed to reflect the existing nature of Heatherton's setting, which would also be augmented by additional tree planting and landscaping where appropriate. The design and appearance of the luxury lodges would be consistent with those which are being provided during the first two phases of the development. The proposed lodges adopt a low profile and have been sited to take account of the local landform; external materials sympathetic to its setting, the retention of open space amenity around the timber lodges; and minimising other incidental related development such as fencing and hard surfaced areas.

7.61 There would be no significant impact from the proposals on either residents' in the locality nor on other holidaymakers staying in the adjacent caravan sites to the north or on other attractions in the area. There are no residential occupiers in the immediate vicinity of the site and the development would continue to be well screened in the wider landscape. Use would be made of the existing access from the B 4318 and it is anticipated that any additional traffic arising from the development would be modest.

7.62 The proposal would not only respect and protect the natural environment, including protected species and habitats, but provide enhancements. The application is accompanied by a detailed Ecological Appraisal which incorporates a raft of biodiversity enhancement measures. The significant biodiversity benefits of the proposal are set out under Policy GN.37 later in this Statement.

7.63 The potential impact of external lighting on the landscape has been considered. A key element of Heatherton is its attractive setting which can be enjoyed not only during daylight hours but with the tranquillity that comes at night together with appreciation of the night sky. In order to retain this sense of an outdoor life and rural setting, particularly for those staying in the luxury lodges and yurts, and to limit Heatherton's carbon footprint, it is proposed to minimise the impact of any lighting associated with the proposed development.

7.64 The proposal would take place in an accessible location and would incorporate sustainable transport and accessibility principles. The proposal forms part of an existing and well-established tourism facility and which forms part of a wider cluster of attractions. It would represent a modest extension of the phased luxury lodge development together with a single manager's dwelling on the site and being very much ancillary to the existing facility. Elsewhere in this statement, we have advanced the locational advantages of the site from a sustainability point of view.

7.65 The proposal would not result in a detrimental impact on highway safety or traffic exceeding the capacity of the local highway network. Use would be made of the existing and upgraded vehicular access which was provided as part of the 2014 permission. We consider this access would be of the required standard to support the modest scale of development proposed. An appropriate level of parking is to be provided on site. Any increase in the number of journeys to and from the site would be mitigated by the proximity of attractions at the site and within the local cluster.

7.66 It is not envisaged that the proposals would have any unacceptable harm to health or to safety as it is the applicant's intention to operate a site that is dependent on repeat as well as new visits. The generally open nature of this part of the site would, however, give a sense of safety to the occupiers. The site would continue to be appropriately managed, with the proposed manager's dwelling forming an important and integral part of the proposal, achieving increased security and a better and more efficient management of the site.

7.67 The proposal would not adversely affect water quality, with appropriate drainage arrangements being made on site. For example, surface water disposal from the proposed accommodation would be managed through soakaways with associated drainage to the two lakes within the site or to the south flowing watercourse and thence onto the Ritec River. The appropriate discharge consents would be the subject of applications to the Environment Agency.

Policy GN2. Sustainable Design

Development will be permitted where the 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 uses 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 and, spaces and other green infrastructure.**

7.68 The proposal would represent a high standard of design and appearance, both to reflect the nature and setting of Heatherton (adjacent to an existing golf course and two lakes) and the intended market including the corporate/business sector for the proposed luxury holiday lodges.

7.69 The site forms part of the existing Heatherton site and would be well integrated into the existing development and built form. The proposal would therefore be appropriate to the local character and landscape context with careful attention being given to the siting, layout, landscaping and materials used. The proposal seeks to make use of the site's topography and natural features, including lakes, trees and surrounding boundary vegetation and woodland.

7.70 The external hard surfaces would be constructed in appropriate materials, with permeable materials used wherever feasible. Drainage channels are provided along the internal access roads.

7.71 The proposal incorporates a resource efficient and climate responsive design as set out under Policy GN.4 below.

7.72 The applicant is aware of the importance of providing a site and facilities which are accessible for visiting families, including older people and those with disabilities and with the intention of providing equal opportunities for all visitors. The proposed luxury lodges provide flexible and adaptable design, as with lodges provided as part of the 2014 permission, the units could be adapted such as the provision of ramps for people with mobility issues. The units provide ground floor accommodation and would fully comply with relevant Building Regulations in terms of internal layout.

7.73 The proposal would continue to provide a high-quality public realm with a well-designed outdoor space and setting and good linkages within and around the site and beyond the site's boundaries. For example, the proposal would provide private open space around each lodge whilst promoting a sense of a mixture of enclosure, amenity and well-being for occupants as their demands change during a visit, together with a general sense of relaxing in a rural environment.

7.74 The proposal seeks to address issues of community safety through an appropriate design and layout throughout the site, with appropriate external lighting and parking areas with a high level of surveillance. In the submitted plans attention has been given to a layout which incorporates clear, direct flows to and around the various buildings and attractions.

7.75 A key part of the application proposal would be the provision of a managers/security dwelling on the site, justified by the high incidences of security breaches and break-ins at the site. This has increased in more recent years. The manager's dwelling has been located in close proximity to the lodge and yurt development in order to support the overall operation of both the Heatherton and Florence Springs parts of the business.

Policy GN3. Infrastructure and new development.

Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development, and

- 1. Related in scale and kind to the development; and**
- 2. Provided on site wherever appropriate. In exceptional circumstances contributions may be made to the provision of facilities elsewhere, provided their location can adequately service the development. The timely provision of directly related infrastructure, services and community facilities shall be secured by planning condition(s), the seeking of planning obligation(s) by negotiation, and / or by any other agreement or undertaking.**

The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed where these requirements cannot be supported by land values.

Measures necessary to physically deliver a development and ensure that it is acceptable in planning terms will be required in the first instance. Where appropriate contributions may be sought for a range of purposes...:

In the event that viability considerations indicate that not all the identified contributions can reasonably be required, priority contributions will be determined on the basis of the individual circumstances of each case. In the case of housing developments, priority will be given to affordable housing unless there is an overwhelming need for the available contribution, in whole or in part, to be allocated for some other appropriate purpose/s.

7.76 There would be no requirements for significant additional infrastructure to serve to new development other than that described in the application (which includes amendments to and extension of the internal access road). It is understood that no significant modifications

are required to the electricity or water supply which are available. Appropriate arrangements would be made for the disposal of sewage and surface water, with the latter being through soakaways.

7.77 We are not aware of any infrastructure capacity issues in respect of the 2014 permission. It is anticipated that the current proposal would make use of the existing connections which are available on site and nearby. A new bio-digester is proposed to serve the proposed new managers dwelling and 'meet and greet' building on a different part of the wider site to the proposed timber lodges.

7.78 The facilities at Heatherton are used by the local population, with payment only required for the day to day use of the activities available. In terms of recreational and open space, this is already the setting for the proposed development.

7.79 As part of the 2014 permission, the development included improvements in the pedestrian and cycle links within the site and the locality. Visitors would be able to make use of cycle hire and the encouragement to walk and cycle where possible. The site is on a regular bus service route which serves the local area. The applicant will continue to organise a taxi service to collect visitors arriving/leaving by train or coach at Tenby.

7.80 The applicant is aware of the findings and proposals made by Kite Ecology in its Ecological Survey of Heatherton and its relationship with any areas of special nature conservation and has incorporated the recommendations in a comprehensive landscape plan for the site.

7.81 It is noted that as part of the 2014 permission, an appropriately sized bio-digester was to be provided as part of the previous luxury lodge development and the applicant made an application to Welsh Water for a new metered water connection to serve both the luxury lodge and yurt development.

7.82 Therefore, we do not believe that the proposal would place any material burden upon existing infrastructure or to require appropriate financial contributions, in accordance with the above policy and other local guidelines.

GN4. Resource Efficiency and Renewable and Low-Carbon Energy Proposals.

Development proposals should seek to minimise resource demand, improve resource efficiency and seek power generated from renewable resources, where appropriate. They will be expected to be well designed in terms of energy use.

Developments which enable the supply of renewable energy through environmentally acceptable solutions will be supported.

7.83 The applicant is aware of the importance of resource efficiency and of maintaining a low carbon approach to the development.

7.84 The proposed luxury lodge element of the proposal would represent the third phase of similar form of development which has previously been found to be acceptable on this northern part of the Heatherton site.

7.85 The proposed luxury lodges would be built to the same high standard as those built as part of the first two phases of the development. Some of the key attributes would include the following:

- The use of high-quality materials would result in reduced maintenance and provide a longer life for the company's investment.
- The luxury lodges would be built on a suspended chassis rather than the conventional slab footing this removing the need for significant excavation and minimising ground disturbance.
- To minimise the impact of any lighting, the use of low-level bollard lighting along the access road extension and individual parking areas, with downward lighting on lodges where required, thereby limiting on surrounding bat habitats and foraging areas.
- As with the 2014 permission, it would be possible to incorporate solar panels in the construction of the timber lodges.
- Be designed to a high standard to have excellent insulation properties, such as to floors, roofs and ceilings and double glazing to all fenestration.
- Use of energy efficient appliances.
- Good use of passive sun for natural light together with the use of tinted glass to reduce the impact of artificial lighting over the lakes.
- Use of locally sourced building materials and techniques where practically possible.
- Use of appropriate sustainable drainage arrangements.

7.86 In relation to the proposed manager's dwelling and 'meet and greet' building, these would be built to modern standards in accordance with current Building Regulation requirements. Use would be made of appropriate materials in order to ensure a high energy efficient building with appliances installed to minimise water and energy use.

GN.22 Prior Extraction of the Mineral Resource

Where new development is permitted in an area of mineral resource, prior extraction of any economic reserves of the mineral must be achieved, wherever appropriate in terms of economic feasibility and environmental and other planning considerations, prior to the commencement of the development.

7.87 The site lies within an area of priority in the Local Plan for mineral extraction. In this case no evidence suggests that there is a particular demand for extraction from the site at this time and in previous recent applications for other development at Heatherton, no objections have been raised by the Council in this respect. As such, the development would comply with the above policy.

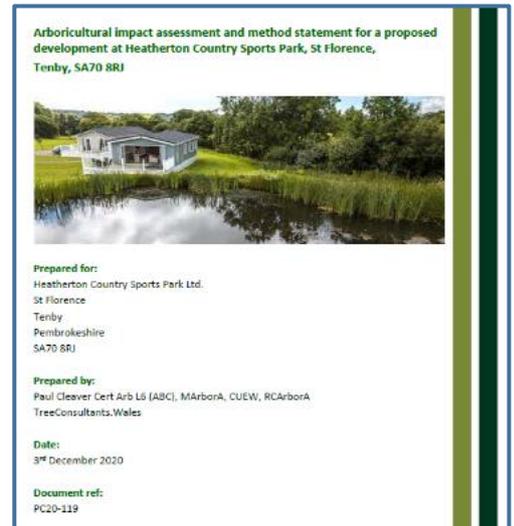
GN.37 Protection and Enhancement of Biodiversity

All 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, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.

7.88 The proposal would not only conserve but enhance the biodiversity value of the site. The site is not considered to be of high ecological value with this specific proposal only affecting a small parcel of an adjoining field and part of an existing and well-established golf course, land which has previously been modified and used for recreational purposes.

7.89 The site is affected by any special landscape or national or local nature conservation designations. The site essentially forms part of a large tourist attraction with its associated various buildings and attractions.

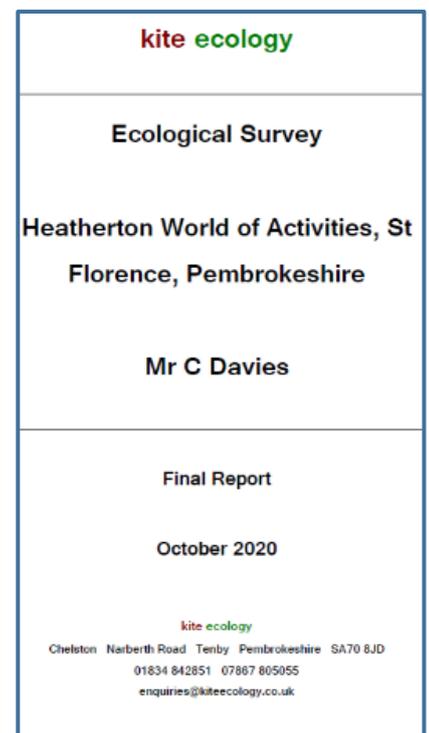
7.90 The application is accompanied by an updated Tree Survey and Impact Assessment (see **Appendix C**). We are not aware that the site is covered by any Conservation Area designation or Tree Preservation Orders. The overall conclusions of the Report are that the development proposal would be sympathetic to the site's existing mature tree population and that the proposal's impact upon the local landscape character would be positive in the short, medium and longer term. In addition, new planting and enhancements have been included, as indicated on a submitted plans. Any loss of trees or other vegetation would not be significant, which would include a section of hedge bank/tree to accommodate the residential element, whilst it is recognised that several Ash trees along the watercourse have already been earmarked for removal within the site due to Ash die-back disease. This would be mitigated through new and/or replacement planting throughout the site. Any pressure for future tree removal is classified as low. It is also advised that all retained trees can be protected during construction works and a detailed Method of Construction Statement is submitted with the application.



7.91 The application proposals are supported by an updated Ecological Survey. It is noted that the Heatherton site has been the subject of surveys since 2007 with a more comprehensive survey being undertaken in 2012 in respect of the 2014 permission.

7.92 The main conclusions of the Ecological Survey are that the area is of relatively low ecological value, with no impact on biodiversity. The main points are as follows:

- In addition to the golf course, there is a small watercourse lined with various trees along the southern boundary of the proposed luxury lodge site.
- There are several trees within the 'rough' areas on the golf course but being relatively newly planted are not of significant amenity value.
- Most of the habitat affected by the proposal is improved grassland forming part of the golf course and that there is no evidence of protected species on site.
- The site is surrounded by farmland and there are good hedgerow links off the site into the wider countryside.



- The mature trees around the survey area would remain unaffected. It is likely that the site is used by foraging and commuting bats and therefore recommendations are made in respect of lighting.
- The small watercourse would need to be protected during the construction phase, such as in relation to the storage of materials.

7.93 It is noted that the Ecological Survey did not include that part of the site which is to be the subject of the proposed manager's dwelling. However, this comprises a small part of a field with only a small section of hedgerow along the frontage being affected by the proposal. However, the hedgerow and trees along the southern boundary of the site would be unaffected and be retained.

7.94 The submitted Site Layout Plan sets out several ecological enhancements which would more than offset the minimal loss of existing trees and small sections of hedgerow as a result of the development. Some of the main elements would comprise the following:

- The provision of a new lake which would provide a new environment for aquatic wildlife and opportunities for recreational fishing;
- The provision of an informal landscaped area towards the north-eastern part of the site, with native planting suitable for foraging wildlife.
- Additional, replacement and supplementary tree planting around the site, such as along the Devonshire Drive boundary and the watercourse.
- Appropriately located bat and bird boxes, as indicated on the submitted drawings.
- New hedgerow and tree planting around two new boundaries of the plot for the managers dwelling – the combined length of the new hedgerows would more than offset the loss in this location.

7.95 The above enhancements could be secured by an appropriately worded condition for the submission of a Biodiversity Enhancement and Management Plan. As such, the development would comply with the above policy in conserving and enhancing overall tree cover and the existing biodiversity, but also national policy and guidance.

8.0 OTHER MATERIAL CONSIDERATIONS

8.1 We have already made reference to the emerging LDP2 and to the likely shift in policy towards the assessment of tourism-related development. Whilst only at the Deposit stage, it represents a significant shift towards a far more flexible approach with the evidence base focusing more on the particular sensitivity and capacity of the landscape in which the site is located and the degree to which an area could accommodate further development. The site capable of supporting further development.

8.2 There has also been in the shift in the type and quality of holiday accommodation which are expected from visitors. Higher quality and all-year round accommodation is encouraged by national policy in order to support the local economy.

8.3 Further, we are aware that the Council has taken a more flexible approach in respect of the provision of more permanent holiday accommodation, such as chalets or timber lodges, in the more rural locations of the County. One example is at Folly Farm / Zoo, where permission was granted in April 2017 (reference 16/0301/PA) for the change of use of

agricultural land to a significant holiday and camping site, including the siting of themed lodges, caravans and glamping, together with car parking and landscaping. An existing building was also allowed to be used to provide warden's accommodation.

8.4 The proposal represented a large-scale development and incursion into open countryside, covering some 11 ha. It effectively proposed a 'themed holiday village' with a wide range of accommodation and ancillary facilities. The main elements comprised a total of 27 timber lodges, 29 showman's wagons, 43 touring caravans, 15 safari tents, 11 bell tents and 10 yurt tents. The application stated that it would be used in conjunction with the wider operation and use of the Folly Farm / Zoo visitor attraction. The approved Site Masterplan is provided below:



8.5 This application was supported by Officers and subsequently granted by the Council, subject to the completion of a legal agreement to secure necessary pedestrian infrastructure improvements to Begelly . A copy of the relevant Planning Committee Report and Decision Notice are attached at **Appendix F** for information.

8.6 We have reviewed the Officers Report and wish to highlight the following points, considered relevant to the current proposal before the Council at Heatherton.

- In terms of Policies SP 5 and SP 16, at paragraphs 6.2 to 6.5 Officers acknowledged that as a stand-alone site, the development would not be at a sustainable location and being unrelated to any settlement, would not be essential. However, Officer's emphasise the proposal's physical and operational relationship to Folly Farm / Zoo, which necessitates its location.
- At paragraphs 6.5 to 6.7 and 6.10 Officers accepted that the proposal was in direct conflict with Policies GN.15, GN.18 and GN.19 and was not either within or even 'well-related' to the nearby settlement of Begelly. The footpath link was also regarded as poor (although to be improved as part of the application). In our view, the current proposal at Heatherton is no less well-connected to the nearby village of St. Florence than was the case here.
- Paragraphs 6.12 to 6.26 consider the design and landscape impacts of the proposal. Notwithstanding the scale of development proposed, Officers concluded by stating at paragraph 6.26 the following:

' 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 our view, the same comments can be applied to the current proposal at Heatherton.

- At paragraph 6.5 the Officers refer to the Wales Spatial Plan (2008 update) (WSP) which identifies the importance of Pembrokeshire of 'robust, sustainable, diverse high-value adding economy underpinned by the area's unique environment...and tourism opportunities.' The following can equally apply to the current proposal at Heatherton:

'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 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.'

In the case of Heatherton, the proposal would support the existing attraction which already has an all-year round use and provide greater benefits to the local economy.

- Throughout the Officers Report great significance is given to the inter-relationship between the proposal and the existing attraction at Folly Farm, in operational and tourism/business terms. This would be the case at Heatherton which is supported by

a detailed Business Plan and the significant economic benefits that would be brought by the proposal. The concluding paragraphs 6.56 and 6.57 are considered particularly relevant:

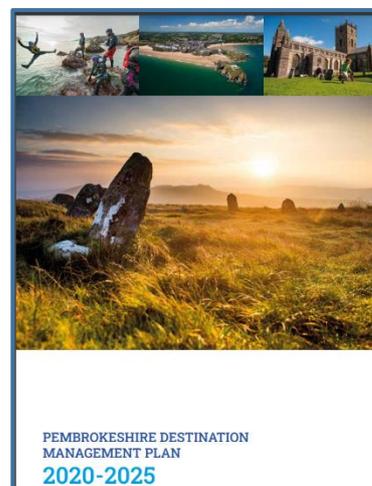
‘The bespoke nature of the development that is proposed and its inherent physical, operational and thematic links with the existing Folly Farm premises, are matters that are considered to have significant weight in the determination of the planning application. It is clear that the proposal is not one 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.

‘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...’

8.7 Whilst the precise circumstances are materially different, the above example illustrates that an exception to planning policy can be justified in certain circumstances. In our view, some of the circumstances in the Folly Farm case could equally apply to the current proposal at Heatherton. Further, the current proposal at Heatherton is on a much smaller scale and would have much reduced environmental impact and given its inherent links with the existing development at Heatherton and Florence Springs and significant economic benefits, any conflict with policy is justified.

8.8 Pembrokeshire Destination Management Plan 2020-2025

In 2020 the Destination Management Partnership issued a document called the Pembrokeshire Destination Management Plan 2020-2025 which sets out the vision for tourism across Pembrokeshire, including that of the National Park. Two key targets are that the value of the visitor economy in Pembrokeshire should increase by 10% in real terms over 5 years and that Pembrokeshire should become a Top 5 UK destination choice. The aim is to build on providing all-year demand, by segmenting the market and their offer. The document highlights that whilst economically vital for the economy, the tourism economy has ‘flatlined’ with a decline in visits over the decade to 2015 and that it needs to respond more positively to market trends, such as a focus on ‘wellness and activity’ breaks. One of the current challenges is also the seasonality of the tourism offer. The application proposal before the Authority serves to respond to these aims and objectives.



8.9 COVID 19

The global pandemic, COVID-19, obviously also has had an immediate and long-term impact to how we all live. Tourism is one of the sectors most affected by the Covid-19 pandemic, impacting economies, livelihoods, public services and opportunities on all continents. All parts of its vast value-chain have been affected. It is even more important therefore for us to

support sustaining (and the growth) of our local tourism industry, at a time when so many are going out of business.

There are numerous articles and assessments that have been undertaken in regard to the impact of COVID 19 on all business sectors, although the impact is visibly evident to everyone. Below shows one extract in regard to a forecast for tourism in Britain (the source of which is provided), however, this was last updated before the recent lockdowns which started in December 2020 / January 2021.

<https://www.visitbritain.org/2021-tourism-forecast>

2021 tourism forecast

(Inbound forecast for the UK in 2020 and 2021 (last updated December 11th Before first 2021 lock downs):

2020 forecast: VisitBritain's latest central scenario forecast for inbound tourism to the UK in 2020, as of December 11th, is for a decline of 76% in visits to 9.7 million and a decline of 80% in spending to £5.7 billion. This would represent a loss vs the pre-COVID forecast of 32.3 million visits and £24.7 billion spending.

Official inbound tourism statistics from the Office for National Statistics have only been published up to June 2020, and detailed statistics only up to March 2020. However, a number of other data sources are available which allow us to assess the state of inbound tourism to the UK. VisitBritain has issued a number of updates to its inbound forecast during 2020.

From mid-March to mid-July, COVID-19 triggered a near-total shutdown in international tourism to/from the UK with a few specific exceptions. Since then, available evidence suggests that there has been increase in visitor numbers from this low point, although they remain at a fraction of their usual level, and dipped again in November.

2021 forecast: Our central scenario for inbound tourism in 2021 is for 16.9 million visits, up 73% on 2020 but only 41% of the 2019 level; and £9.0 billion to be spent by inbound tourists, up 59% on 2020 but only 32% of the 2019 level.

9.0 CONCLUSIONS

9.1 This application comprises a further and important phase of development on the site and sees the further welcomed investment in the visitor economy by Heatherton World of Activities. Indeed, Heatherton has continued to make capital investments since its inception and since 1992 with further investment proposed in the future, together with a resultant significant contribution to spending by visitors into the local economy.

9.2 The proposal is considered to represent a highly sustainable form of development, in full accordance with both national and local planning policy and guidance. The proposal would achieve significant social, economic and environmental benefits.

9.3 The application builds on the 2014 and 2018 permissions which not only resulted in the significant expansion and enhancement of activities provided at the site, but more importantly

introduced two different types of holiday accommodation on the site for the first time. The luxury lodges and yurt accommodation have been successfully implemented on site on a phased basis.

9.4 The current proposal involves a third phase in the luxury lodge development. The additional lodges would represent a logical extension to the existing provision, and which also incorporates a new amenity lake and a series of ecological enhancements as part of the overall development.

9.5 We believe there to be strong justification for a managers/security dwelling to be provided on site. The dwelling would be appropriately located to serve the Heatherton site and fully integrated into the development. The occupation and use of the dwelling could be tied to the site by an appropriately worded condition and if so required, my client will be willing to enter into a legal agreement.

9.6 The proposed development would be well contained within the existing Heatherton site. Due to the local topography and the immediately surrounding development and screening, there would be little if any visual impact beyond the site's boundaries. The landscape character and amenities of the locality would at least be conserved.

9.7 The applicant has given very careful consideration to the layout, scale, form, design and appearance of the development, and which is deemed entirely compatible with the capacity and character of the site and the area within which it is located.

9.8 We acknowledge that the proposal would result in some conflict with certain policies of the currently adopted local Development Plan, such as in respect of the introduction of residential development into the countryside. However, we do not believe the policy conflict to be significant in this case. Further, we believe there are material considerations which should outweigh any policy conflict, such as the need for increased on-site security and to assist in the more efficient running of the business in the future. In addition to further significant investment into the site, the additional luxury would bring the further significant economic benefits to the local economy.

9.9 Further, although only at the Deposit stage, the emerging LDP2 contains an important shift and far more flexible approach in tourism related development policy. We believe the emerging LDP2 adds weight in support of the proposal. Further, the Landscape Character Capacity Assessment issued quite recently in November 2019 is an important document which clearly indicates there is scope for some further tourism development in the area to the north of St. Florence.

9.10 There are not considered to be any technical objections to the proposal, such as in relation to vehicular access, highway safety, infrastructure and drainage. The biodiversity value of the site would not only be conserved but enhanced by the development.

9.11 Therefore, by a process of continual capital investment, this family run business would continue to be a vital part of the local tourism economy in Pembrokeshire.

9.12 It is concluded that this further phase of development has significant planning merit and we would welcome the support of the County Council.

If you require any further information or to discuss alternative options, please do not hesitate to contact Hayston Developments & Planning Ltd.

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RTPI

mediation of space · making of place

APPENDICES