

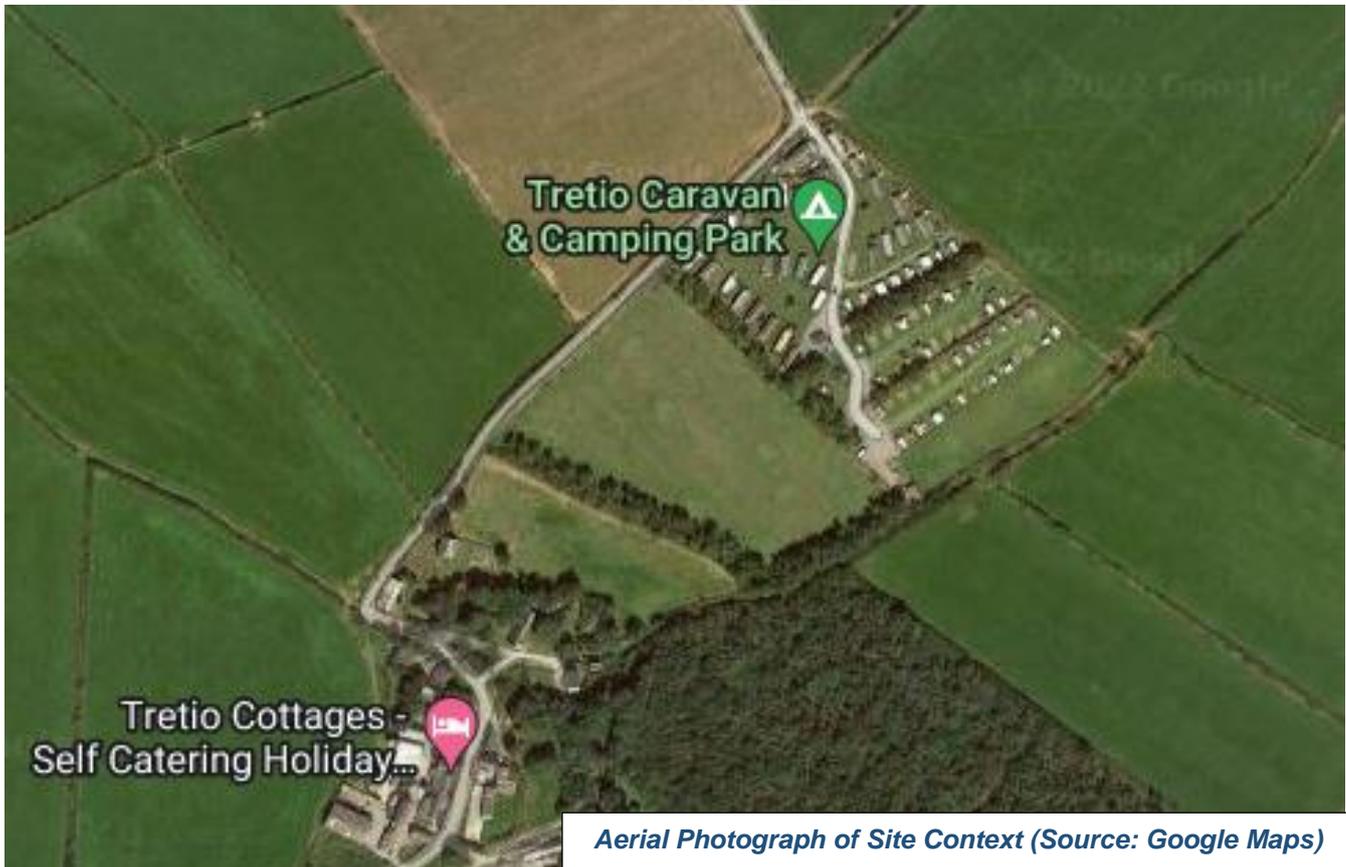


MAJOR PLANNING STATEMENT AND JUSTIFICATION REPORT

CHANGE OF USE OF PITCH AND PUTT AREA AND EXPANSION
WITH 10 SELF-CONTAINED BESPOKE MOBILE
LODGES/CARAVANS AND CAR PARKING TOGETHER WITH
ECOLOGICAL ENHANCEMENTS

TRETIO CARAVAN AND CAMPING PARK, ST DAVID'S,
HAVERFORDWEST, PEMBROKESHIRE, SA62 6DE

1st June 2022



Aerial Photograph of Site Context (Source: Google Maps)



Major Planning Application Town and Country Planning Act 1990

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HAYSTON DEVELOPMENTS & PLANNING LTD is making an application on behalf of Mr Bryn Rees and Mr Phil Rees for the following planning permission:

- **Proposal:** Change of use of pitch and putt area and expansion with 10 bespoke mobile lodges/caravans and car parking together with ecological enhancements
- **Site location:** Tretio Caravan and Camping Park, St. David's, Haverfordwest, Pembrokeshire, SA62 6DE
- **Type of Planning Permission:** Full Major Application
- **Relevant Local Development Plan Policies:** 1, 7, 8, 9, 12, 14, 29, 30, 32, 38, 41, 59 and 60
- **Supplementary Planning Guidance:** Sustainable Design and Development (May 2021); Biodiversity (May 2021); Parking Guidelines (May 2021); Landscape and Seascape Character Assessments (Interim to LDP2 – September 2020)
- **Other Documents:** Caravans, Camping and Chalet Development - Landscape Capacity Assessment (SPG - May 2021); Pembrokeshire Destination Management Plan 2020-2025.
- **National Planning Policy Guidance:** Planning Policy for Wales (PPW) February 2021 (Edition 11) – TANs 5 (Nature Conservation and Planning – 2009), 6 (Planning for Sustainable Rural Communities – 2010), 12 (Design – 2016); 13 (Tourism – 1997), 14 (Coastal Planning – 1998); 15 (Development and Flood Risk – 2004); 18 (Transport – 2007); and 23 (Economic Development – 2014).

1.0 INTRODUCTION

1.1 Please find enclosed the following supporting information:

- **Planning Statement and Justification Report** (this document)
- **Planning application form and certificate of Ownership**
- **Drawing 01a**– Expanded Location Plan – Scale A3 @ 1:2500
- **Drawing 02a**– Location Plan and Site Plan – Scale A3 @ 1:2500 and 1:1000
- **Drawing 03a** – Topographical Survey – Scale 1:1000
- **Drawing 04b** – Overall Proposed Site Plan – Scale A3 @ 1:1000
- **Drawing 05b** – Proposed Site Plan – Scale A3 @ 500
- **Drawing 06b** – Proposed 'Verdee' Lodge Floor Plan – Scale A3 @ 1:50

- **Drawings 07b and 08b** – Proposed ‘Verdee’ Lodge Elevations – Scale A3 @ 1:50
- **Drawing 09b** – Proposed ‘Verdee’ Lodge Illustration
- **Drawing 10b** – Proposed ‘Edmunton’ Lodge Floor Plan – Scale A3 @ 1:50
- **Drawings 11a and 12a** – Proposed ‘Edmunton’ Lodge Elevations – Scale A3 @ 1:50
- **Drawing 13a** – Proposed ‘Edmunton Lodge Illustration
- **Appendix A** – Applicant Personal & Business Supporting Statement
- **Appendix B** -Planning permission for pitch and putt golf course (reference D2/93/32) Decision Notice dated March 1993
- **Appendix C** – Certificate of Lawfulness for an existing use together with ancillary operational development (reference NP/17/0685/CLE) Decision Notice dated 9 January 2018
- **Appendix D** –Preliminary Ecological Appraisal by Gould Ecology dated August 2021
- **Appendix E** –PCNPA Transport Statement
- **Planning Fee** - £460.00

1.2 This application relates to the expansion of an existing and well-established family-run tourism site at Tretio Caravan and Camping Park, St. David’s, Haverfordwest. The existing tourism site comprises several different types of tourism offer which have become established at different periods.

1.3 **Appendix A** details a Personal & Business Summary from Mr Phil Rees which is self-explanatory and refers to the significant investment he has already made and further investment / expansion he wants to undertake as part of this planning application.

1.4 The site has a long planning history. A Certificate of Lawfulness application (reference NP/17/0685/CLE) for an existing use together with some ancillary operational development was granted in January 2018. This Certificate essentially established that the siting of additional mobile home and the use for the southern fields for the seasonal siting of tents, mobile homes and touring caravans were lawful for planning purposes. Therefore, the tourism use of the main site is now lawful for planning purposes.

1.5 The applicant now seeks a modest expansion of the existing tourism use. This relates to an under-utilised pitch and putt golf course located to the south-west of the main tourism site. The development would involve the siting of 10 self-contained bespoke mobile lodges/caravans located at various points around an internal access track, together with associated car parking, additional landscaping and biodiversity enhancements. Vehicular access would be via the existing main tourism site. The pitch and putt golf course was approved in 1993 (D2/93/32 – see Appendix B) when the area was in the Preseli Pembro District Council designation.

1.6 The application proposal is deemed to be modest scale and a low-key tourism development which would complement the existing tourism facilities on the site. The development would be located directly adjacent to the existing main tourism site and would make use of brownfield land, which already has a recreational use. Given its modest scale, form and design, and package of landscaping and biodiversity enhancements, the proposal would not have a significant impact upon the countryside, would protect the wider landscape

character of the St. Brides Bay area, and would have full regard to the special qualities and beauty of the National Park.

1.7 We believe the proposal has the full support of both national and local planning policy. The proposal would be compliant with Policies 38 and 41 of the LDP which relate to tourism development. The recently adopted SPG on Caravan, Camping and Chalet Development provides opportunities for additional tourism development subject to landscape capacity. We believe the proposal falls within the guidelines set out within this document for the area.

1.8 This report is prepared in accordance with the requirements of policies contained within the Local Development Plan for Pembrokeshire Coast National Park (adopted September 2020) and the Welsh Government Development Management Manual (05 May 2017).

1.9 Major development is defined in Article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (DMPWO) and includes development carried out on a site having an area of 1 ha or more (there is different criteria for new housing). The site has an area of 2 ha. The DMPWO requires pre-application consultation (PAC) to be carried out by the developer/applicant on all planning applications for 'major' development, whether for full or outline permission. Given that the application constitutes major development this planning statement has been prepared to for the purpose of describing and justifying the proposal to inform the pre-application consultations.

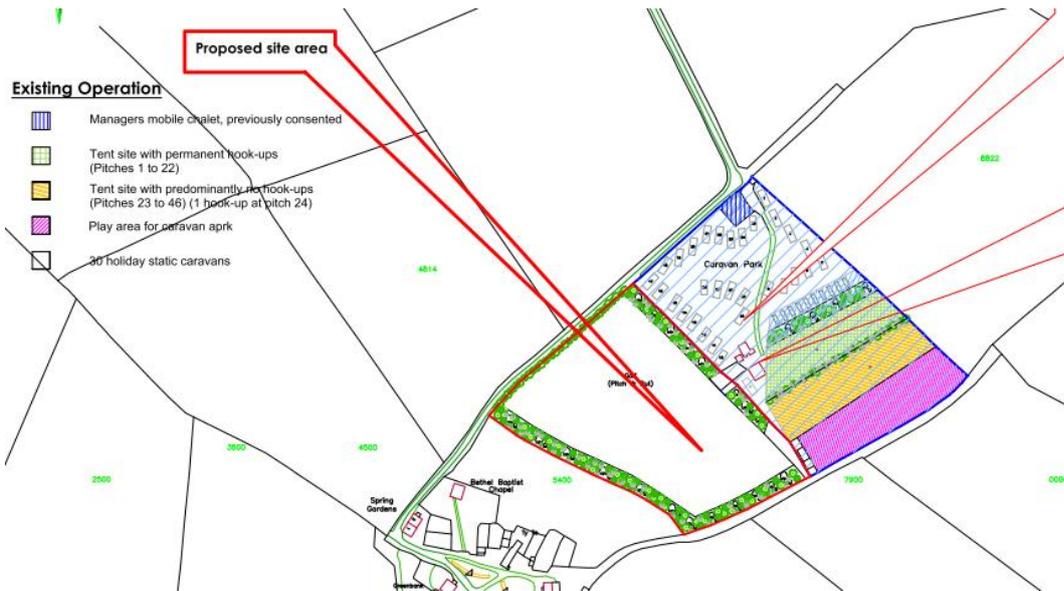
1.11 Updated planning application documentation (proposed scheme) will be prepared post the pre-application consultation, including a report on the pre-application consultation and its responses, for submission with the planning application to the Pembrokeshire Coast National Park Authority.

1.12 A formal pre-application enquiry submission will also be made to PCNP to enable discussion with PCNP Planners so that the proposed scheme can be reviewed and have input to prior to formal planning application submission.

2.0 SITE DESCRIPTION AND LOCALITY

2.1 Tretio Caravan and Camping Park lies to the north of Pembrokeshire, approximately 6kms (4 miles) from St Davids. The site is accessible from an unnamed road which runs from St Davids to Penparc or from the A487.

2.2 Tretio Caravan and Camping Park lies a short distance to the north-east of the hamlet of Tretio. The Caravan and Camping Park is set within open countryside being surrounded by open fields and pockets of woodland. There is a Public Footpath to the south-eastern boundary of the land.



Location Plan – Drawing 01a

2.3 The site is a well-established tourism facility serving the local area. There is a static caravan/mobile home used as a manager’s dwelling sited just off the main site entrance, and a reception building, toilet block and play area within the more central part of the site. There is also a small caravan storage area located towards the rear of the site. In terms of the main existing tourism complex, the northern part is occupied by 30 static holiday caravans; a central strip is occupied by up to 10 motorhomes; with two lower parts of the main site occupied by up to 46 tent plots, some with the benefit of electrical hook ups. The various lawful tourism uses on the site are clearly highlighted on the submitted drawings.

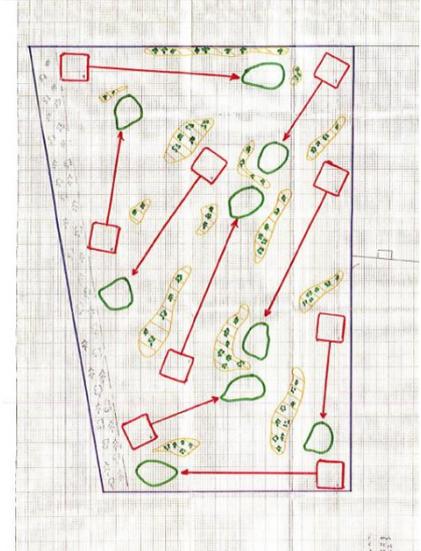


Above Right – Aerial photo of the site

Existing Site Plan – Drawing 02a



2.4 There is an established but under-utilised pitch and putt golf course which covers the western most part of the site owned by our client and an informal grassed play area on the far south-eastern part of the site. It is this pitch and putt golf course, which has an area of some 0.2 ha which is the subject of this application. There are two gated access points into the site from the main tourism complex, about midway along the north-eastern boundary. The approved plan from the D2/93/32 permission for the golf course is scanned in to the right:



Approved plan from the D2/93/32 permission for the golf course

2.5 The application site is regular in shape and has a gentle slope down from north to south. The site has been in use as small pitch and putt golf course, with some 9 holes, and is still used in the summer months for the visitors to the Caravan Park. Over the years the applicant has carried out a substantial tree planting scheme, such that the south-western and south-eastern boundaries of the site are now well screened by trees. There is a hedgerow along the north-western land frontage. There is a block of woodland located beyond the adjacent public right of way to the south of the site. The following are some photographs illustrating the character and appearance of the current site and its boundary features:

Image 3: Amenity grassland, looking north



Image 2: Amenity grassland - looking south



Image 1: Amenity grassland - looking west



Image 6: Plantation woodland - south-western margin, looking south



3.1 The site has been the subject of several applications over the years, including certificates of lawfulness, some of which related to tourist accommodation and facilities which are available at the site today.

3.2 As part of the Certificate of Lawfulness application (reference NP/17/0685/CLE) submitted in 2017, we provided a comprehensive review of the planning history relating to the Caravan Park. The key elements are summarised below.

3.3 In September 1969, outline planning permission was granted by Haverfordwest Rural District Council (Pembrokeshire County Council (PCC) for a change of use of the land to a 'holiday caravan site'. This was subject to a seasonal occupancy condition and permitted no more than 30 caravans on the site. **Application reference – HR/8610/69/299**

3.4 In April 1970, detailed permission was granted by PCC 'for the purpose of layout of land as a caravan site'. Again, this was subject to a seasonal occupancy condition and the number of caravans was restricted to 30. This permission also had a landscaping condition which stipulated that trees were to be planted around the perimeter of the site, with details to be agreed with the PCC. **Application reference – HR/8610/70/96**

3.5 Permission was granted by Preseli District Council in July 1978 for the siting of an additional ten touring caravans on the site. **Application reference – D2/78/535.**

3.6 The site therefore had permission for a total of 40 caravans on the site under two permissions, HR/8610/69/299 and HR/8610/70/96 combined, and D2/78/535.

3.7 Mr Bryn Rees purchased the Caravan Park in October 1991 and installed electricity on the site. During 1992-93, Mr Bryn Rees planted approximately 2,000 trees around the site, renovated the toilet block and laid on service hook up points for the caravans. These trees are now well established and will act as screening value to the application site.



Current photographs of screening of the golf course on the southern boundary

3.8 In March 1992, an application was submitted in order to bring closed season for all 40 caravans in line with structure plan policy and to allow winter storage of the 30 caravans, as granted by the earlier permissions. Preseli Pembrokeshire District Council allowed the owners to *'extend period of operation of caravan site and retain 30 caravans on their pitches during the closed season.'* This effectively removed the seasonal occupancy condition, stipulating only that *'the site shall not be used for the stationing of touring caravans, nor shall the static caravans be used for human habitation during the period 10 January to 28 February in any year.'* This new permission also stipulated that no one touring caravan shall remain on site for more than 21 days in any year. **Application reference D2/91/1234.**

3.9 In March 1993, permission was granted for the change of use of agricultural land to a pitch and putt golf course on land adjoining the actual Caravan Park. This became established in 1994 and occupies to the land to the south-west of the main site. **Application reference – D2/93/32. It is this area of land that is the subject of the current development proposal. A copy of this decision is attached at Appendix B.** The following aerial photograph (undated) shows the relationship of the pitch and putt course to the main holiday complex. Established trees on boundaries should be noted.



Application site and golf course

3.10 The planning permission was the subject of several conditions. These included that the course shall only be used by occupiers of caravans on Tretio Caravan Park (1); that the vehicular access towards the south-western road frontage be closed and be replaced with a hedge bank (2); and that in the event the course becoming inoperative for a continuous period of 12 months, the shall be restored to its former agricultural use. The landform was therefore modified to reflect its use a pitch and putt golf course.

3.11 In July 1993 permission was granted for the erection of a grey sheeted agricultural building. This is the workshop building located towards the far southern boundary of the site. **Application reference – D2/93/441**

3.12 In the few years between 2012 and 2016 the Authority became concerned over various alleged breaches of planning control on the land. These alleged breaches related to the occupation of one of the caravans as a managers dwelling, the stationing of additional caravans on the land, the use of the southern fields for up to 50 tent pitches, the siting of some play equipment, the erection of a storage building, and the use of a small part of the site as an ancillary boat storage area. The Authority served a total of three Planning Contravention Notices (PCN's) in June 2012, November 2015 and November 2016 (references EC11/004 and EC16/0076) on the land. Following various correspondence between the applicant and the Authority to resolve matters, two Certificates of Lawfulness applications were submitted in order to regularise the breaches of planning control.

3.13 In May 2016, a Certificate of Lawfulness application was granted which established that the caravan located at the site entrance was now lawful for planning purposes. **Application reference – NP/16/1040/CLE**

3.14 In January 2018, a Certificate of Lawfulness application was granted which established parts of the main site for additional tourism use and some additional ancillary operational development. More specifically, it established the case for the stationing of one additional static caravan on the northern part of the site (30 static caravans), the use of the 'southern fields' for seasonal camping purposes in the form of up to 47 tents, tourers and motorhomes between Easter and the end of October each year, and that the play equipment has been in place for at least 4 years. **Application reference – NP/17/0685/CLE. A copy of this decision is attached at Appendix C.**



The Certificate of Lawfulness Decision Plan – Application Reference NP/17/0685/CLE

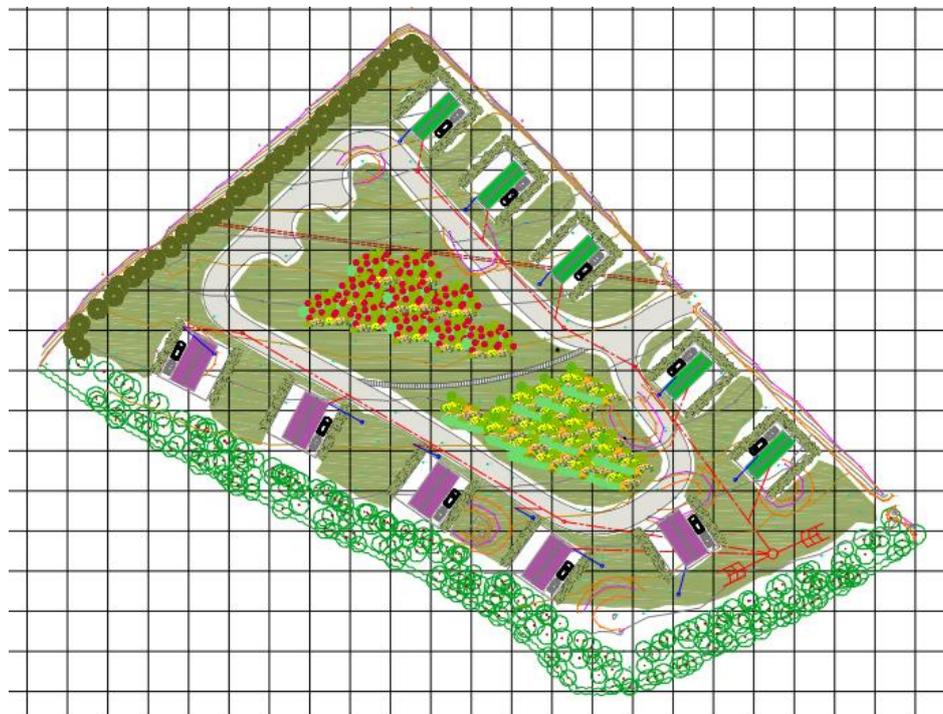
3.15 Whilst several possible minor breaches of planning control were alleged by the Authority, it was accepted that these either had the benefit of planning permission, were so minor that they were either not development and/or were ancillary to the main tourism use of the site, or were not an issue for the Authority. These included a reception/utilities building, a boat storage area, a winter caravan storage area, and a climbing wall attached to an established workshop building on the land.

3.16 Therefore, following the granting of the two Certificates of Lawfulness applications in May 2016 and January 2018, we understand there are no longer any outstanding planning/enforcement issues relating to the Caravan Park. The various tourism uses which now currently operate from the site are therefore lawful for planning purposes. Further, that the adjacent pitch and putt golf course is lawful by virtue of the planning permission granted in March 1993.

3.17 From a visit to the site and a review of the above photographs, the site and the existing holiday facilities and accommodation are maintained to a very high standard. The proposal would build upon this high standard of development.

4.0 PROPOSAL

4.1 This major full application for the modest expansion of the existing Caravan Park into the adjoining pitch and putt golf course area comprising 10 self-contained bespoke mobile lodges/caravans, together with car parking, landscaping and biodiversity enhancements. Attached at **Appendix A** is a short supporting statement prepared by the applicant which provides brief background to the proposal.



Overall Proposed Site Plan – Drawing 04b

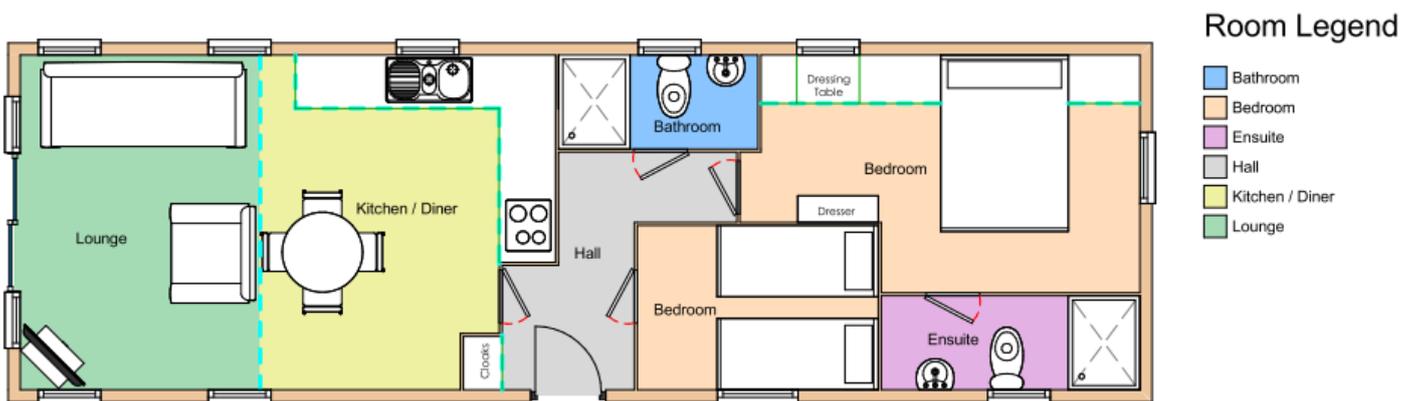
4.2 As detailed in **Appendix A**, within the applicant’s personal and business statement, Tretio Caravan & Camping Park currently employs 2 part-time and 2 full time staff and if the proposed expansion is approved a further 2 part-time jobs will be generated. The expansion will see an approximate financial investment up to £1.5 million, which obviously contributes to the local economy through the use of local builders and suppliers.

4.3 The proposed Site Plan shows the intended layout of the site. This shows the indicative location of the 10 holiday lodges arranged around the south-western, south-eastern and north-eastern periphery of the site, accessed from a circular internal access track. Within the centre of the site there would be a large informal amenity area with two areas of wildflower meadow.

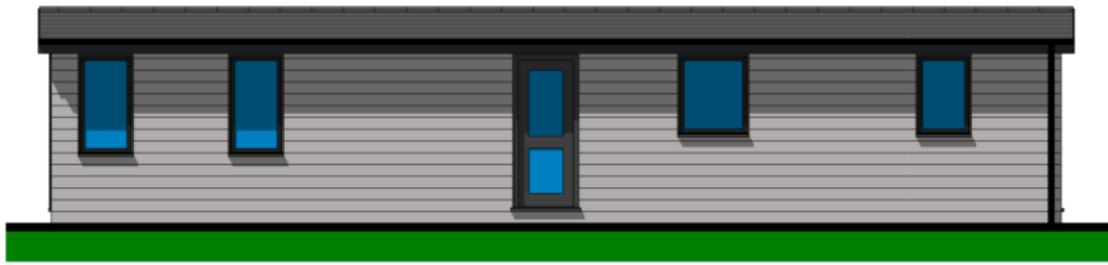
4.4 Use would be made of an existing field gate access point located about midway along the north-eastern boundary of the site, in the vicinity of the reception/facilities building and play equipment. This would provide a logical link to the existing main tourism site. Therefore, vehicular access would be via the existing main entrance off the lane located towards the far north-eastern corner of the main site, and in proximity to the manager’s dwelling.

4.5 Two different holiday lodge/caravan units are proposed as part of the development. The units would meet the definition of a caravan under the 1968 Act and 2006 Order. The proposed units would be well spaced each with an adjacent area for parking on one side and an amenity area on the other side. The units would be enclosed by hedge banks with native species on three sides for screening and privacy. All the units would face into the central part of the site.

4.6 Along the north-eastern edge of the site it is proposed to locate 5 units of the ‘Vendee’ lodge design. These would comprise self-contained accommodation including 2 bedrooms for up to 4 people. The units would have a floor area of 52 sqm (13 metres by 4 metres) with a height to ridge level of 3 metres.



Proposed Floor Plan of ‘Vendee’ Lodge – Drawing 06b



Right Side

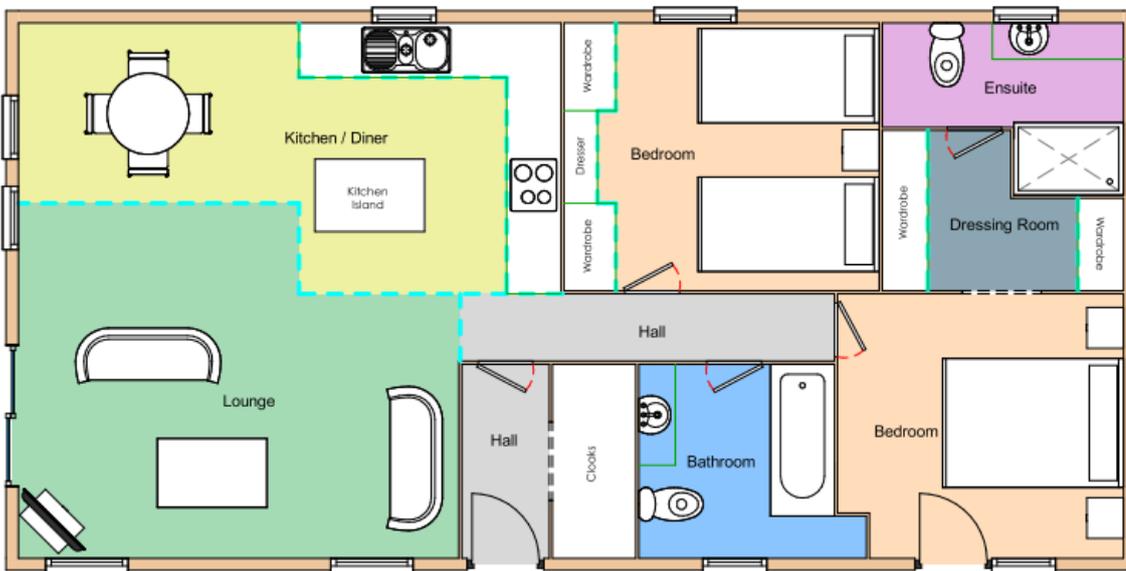


Front

This is a mobile lodge/caravan meeting the definition of a caravan under the 1968 Act and 2006 Order

Proposed Elevations of 'Vendee' Lodge – Drawing 07b

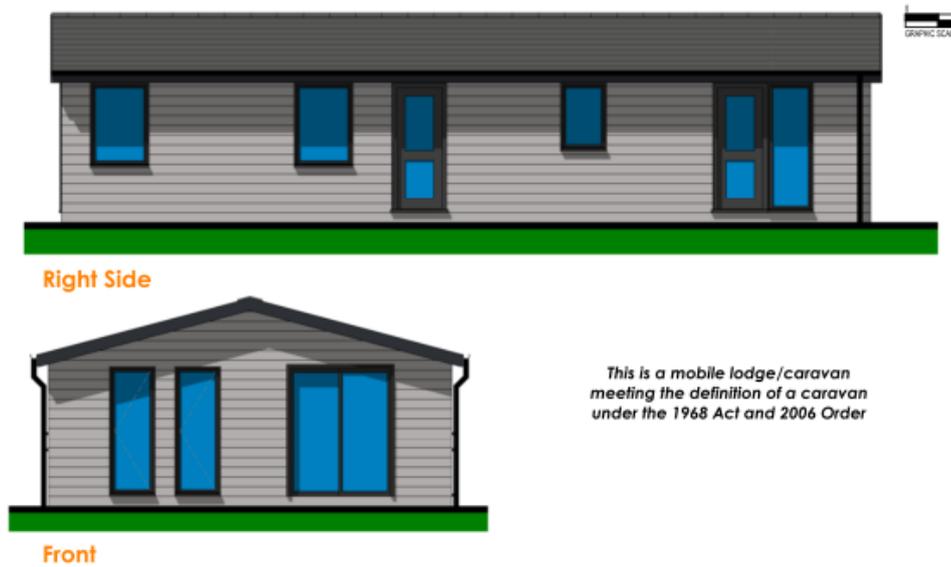
4.7 Along the south-western and south-eastern edge of the site it is proposed to locate 5 units of the 'Edmunton' lodge design. These would again comprise self-contained accommodation including 2 bedrooms for up to 4 people. The units would have a slightly larger floor area of 75 sqm (12.5 metres by 6 metres) with a height to ridge level of 3.3 metres.



Room Legend

- Bathroom
- Bedroom
- Dressing Room
- Ensuite
- Hall
- Kitchen / Diner
- Lounge

Proposed Floor Plan of 'Edmunton' Lodge – Drawing 10b



Proposed Elevations of 'Edmunton' Lodge – Drawing 11a

4.8 The overall form and design of the two units would be similar. The walls would be in high density wood composite cladding (mist grey in colour), the low-pitched roofs in blue/black coated steel pantile roof, the doors and windows in uPVC (anthracite in colour), and the rainwater goods in black uPVC.

4.9 The proposed internal access track would be constructed in permeable compacted crushed stone. There would be a pedestrian access route across the central amenity area of similar construction.

4.10 The existing trees and vegetation along all four boundaries would be unaffected by the proposal and therefore retained. It is proposed to provide some additional tree planting along the lane frontage to provide additional screening of the development. In addition to the propose hedge banks around each of the proposed units, two large areas of wildflower meadow are to be created within the central open part of the site. The layout of the proposal seeks to keep development away from the lane frontage and with the limited scale of development proposed, the site would retain a generally open and spacious character.

4.11 in terms of services/drainage arrangements, a new package treatment plant facility with clarified drainage field would be located towards the southern end of the site. The roof water from the proposed units would be to individual soakaways

4.12 Biodiversity enhancements would include various additional planting schemes with and around the site, together with the installation of bird and bat boxes to the existing facilities building.

4.13 Because of the nature of the development, it will be possible to let the lodges throughout the year thus fulfilling an objective of the Park Authority to extend the use of visitor accommodation beyond the high summer and shoulder seasons. The location of the site makes the all year letting particularly attractive to visitors to north-west Pembrokeshire and the area around St. David's.

5.0 PLANNING POLICY BACKGROUND

5.1 In September 2020 the National Park Authority (NPA) adopted the Replacement Local Development Plan (LDP2). This comprises the main local policy document in the assessment of the proposal.

5.2 The following policies and guidance from the recently adopted LDP2 are deemed to be of relevance to this proposal:

- Policy 1 – National Park Purposes and Duty
- Policy 7 – Countryside
- Policy 8 – Special Qualities
- Policy 9 - Light Pollution
- Policy 14 -Conservation and Enhancement of the Park
- Policy 29 – Sustainable Design
- Policy 30 – Amenity
- Policy 32 – Surface Water Drainage
- Policy 38 – Visitor Economy
- Policy 41- Caravan, Camping and Chalet Development
- Policy 59 – Sustainable Transport
- Policy 60 – Impacts of Traffic

5.3 In May 2021 the Authority adopted the Caravan, Camping and Chalet Development SPG. The SPG is derived from a previous capacity study undertaken in 2015 and does not appear to deviate from the earlier study in its format, contents & conclusions. The SPG and earlier capacity study therefore form the primary tool for assessing the proposal in the context of Policy 41 (see below).

6.0 POLICY ASSESSMENT

Policy 1 National Park Purposes and Duty (Strategy Policy)

Development within the National Park must be compatible with:

- a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and**
- b) the public understanding and enjoyment of the special qualities.**

In determining proposals, due regard will be paid to the need to foster the economic and social well-being of the local communities within the Park provided this is compatible with the statutory National Park purposes embodied in the foregoing considerations.

6.1 It is considered that the envisaged development of a pitch and putt course meets the requirements of Policy 1. The proposal would be of modest scale involving the provision of 10 bespoke holiday lodge units located directly adjacent to the main holiday complex at Tretio Caravan and Camping Site. The proposal involves the development of a brownfield site in use

for recreational purposes rather than an encroachment into open fields with no harmful impact upon the natural beauty or special qualities of the Park.

6.2 The proposed lodge units would be suitable for all year use as holiday accommodation and can therefore contribute to maintaining economic activity in the St. David's area at a time when traditional camping and caravan holidays are less attractive. The proposal would further diversify the type of holiday accommodation offer at the site with the provision of 10 high-quality holiday lodges set within an open and attractively landscaped setting.

6.3 Given the nature of the development, the proposal would foster the economic and social well-being of local communities. The proposal would boost spending at local tourism facilities /attractions and in nearby settlements, such as St. David's, Abereddy, Porthgain, Solva and Newgale which are within a relatively short travelling distance from the site.

Policy 7 Countryside (TIER 4) (Strategy Policy)

Outside the identified Centres is countryside where development must be strictly controlled. The following forms of development will be acceptable in principle:

- a) a new rural enterprise dwelling is proposed**
- b) farm diversification including farm shops is proposed (see Policy 45).**
- c) it constitutes the conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions (see Policy 40). Off-site affordable housing contributions will be sought on market dwellings.**
- d) A rural enterprise or tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential (see Policy 38 and Policy 43).**
- e) A new or extended community facility is proposed (see Policy 54).**
- f) The proposal constitutes One Planet Development.**
- g) New farm buildings are justified for agricultural purposes.**
- h) Land is released at the edge of a Centre for a small employment site (See Policy 43) or an extension to an established business in the countryside is required or it is a new business aiming to join existing clusters.**
- i) There is an exceptional land release adjoining Centres for affordable housing to meet an identified local need (see Policy 49).**
- j) Assisting coastal communities in preparing for and adapting to coastal change (see Policy 34, Policy 35, Policy 36, Policy 37).**
- k) There is a need for an exceptional land release to relocate development affected by coastal change (see Policy 36 and Policy 37).**
- l) There is a need for a Gypsy and Traveller site in a countryside location (see Policy 53).**
- m) Renewable energy proposals (see Policy 33).**

6.4 The proposal would fall within at least one category of development which can be acceptable in principle in the countryside. The proposal would fall within category (d) as a rural enterprise or tourist attraction (in the form of accommodation) where the need to locate in the countryside is essential. This would be in accordance with relevant Policies 38 and 41 as demonstrated later in this Statement.

6.5 These policies suggest that various types of holiday accommodation can be acceptable in countryside locations subject to their scale and the capacity of the landscape to accommodate such development as set out within the Caravan, Camping and Chalet Development SPG adopted in May 2021. As demonstrated later in this Statement, the proposal would accord with the parameters set out within this document.

6.6 The proposal would not represent an entirely new tourist site within the countryside. It relates to a well-established tourist facility which already offers a range of holiday accommodation, with some 30 static mobile homes/caravans, 10 motorhomes and a two tent sites for capacity for some 46 pitches. In our view the proposal would represent a logical and sensitive expansion of those existing facilities, and with only 10 lodge units being proposed, can be seen to be a very modest and relatively low-key expansion of the site.

Policy 8 Special Qualities (Strategy Policy)

The special qualities of the Pembrokeshire Coast National Park will be conserved and enhanced. The priorities will be to ensure that:

- a) The sense of remoteness and tranquillity is not lost and is wherever possible enhanced (see Policy 9).**
- b) The identity and character of towns and villages is not lost, through coalescence and ribboning of development or through the poor design and layout of development and is wherever possible enhanced. The identification of Green Wedges will assist in achieving this priority.**
- c) The pattern and diversity of the landscape is protected and wherever possible enhanced (see Policy 14).**
- d) The historic environment is protected and where possible enhanced.**
- e) Development positively enhances the National Park's ecosystems and the components that underpin them. The protection and enhancement of links between sites or the creation of links where sites have become isolated is of particular importance (see Policy 10, Policy 11, Policy 12 and Policy 29).**
- f) Development conserves and wherever possible enhances Geological Conservation Review sites or any other important geological resource (see Policy 12)**
- g) Species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value.**
- h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park (see Policy 13).**
- i) Development of the undeveloped coast is avoided and sites within stretches of the developed coast are protected for uses that need a coastal location (see Policy 17, Policy 18, Policy 33 and Policy 38).**
- j) The National Park's network of green infrastructure both new and existing is protected and enhanced (see Policy 10, Policy 11, Policy 12, and Policy 15).**

In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact will be given special consideration.

6.7 It is suggested that not one of the special qualities of the National Park would be lost or compromised by the proposed development.

6.8 The proposal relates to the modest expansion of an existing tourist facility. Whilst there would be an encroachment into the adjacent pitch and putt course, there would be no harmful impact upon the remoteness and tranquillity of the area. Any additional activity generated by the development would be limited to an area close to the existing tourism complex. The proposal would represent a low-key development and whilst the immediate locality is distinctly rural, with a general absence of larger settlements and other development, its character is affected to a significant degree by the presence of the existing caravan and camping site and the small hamlet of Tretio located a short distance to the south-west. The proposal would therefore form part of a small cluster of development in the countryside.

6.9 The proposal would not affect the identity or character of towns and villages and the overall pattern and diversity of the landscape would be protected. The proposal would be closely related, both physically and visually, to the existing holiday complex. Not only would the proposal retain the generally open and spacious character of the site but also that the presence of a field to the south-west would maintain visual separation to Tretio. There are no buildings or features of historic interest which would be affected by the proposed development.

6.10 In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact have been given special consideration in the planning of the development. For example, the development would have a close physical and functional relationship with the existing holiday complex and where the layout and form of development can be satisfactorily integrated into this sensitive landscape. The site would be sensitively landscaped with existing boundary hedging and trees retained and supplemented where appropriate. The site has a high degree of visual enclosure, which includes a block of woodland to the south. Whilst the site is at present generally open to views above the hedge bank from the lane, it is proposed to carry out some additional landscaping along the site frontage which would provide some softening of the development from this direction. The following is a street scene view of the site and its immediate context from the lane:



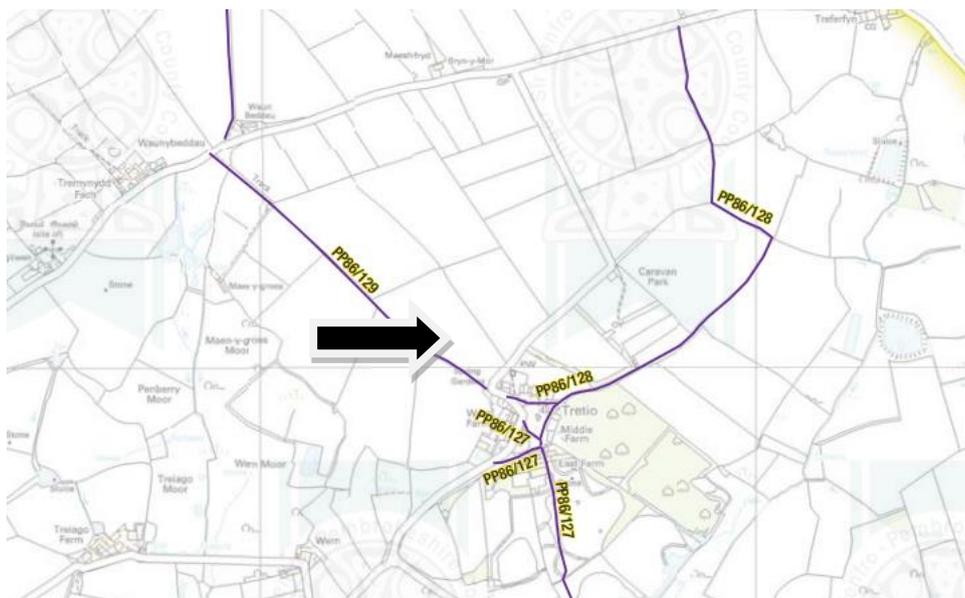
***View of Site Looking North-East Along Lane (Source: Google Street View) –
Established trees screen of the site***

6.11 The application site is located away from the more sensitive undeveloped coast and the Coast Path to the north and north-west. It is likely that, given the siting, modest scale and low-profile of the development, the surrounding topography and high degree of visual enclosure, any potential views of the development from this direction would be very limited or possibly non-existent. There is some rising ground to the north of the site where, for example, parts of the existing site caravans are visible in the approach to the site from along the lane to the north. However, given the scale and low-key nature of development proposed together with the additional planting along the site frontage, any additional impacts are likely to be limited and not harmful.



View towards site from along lane looking south-west

6.12 There are three public rights of way which converge on Tretio from the north-west, north-east and the south (references PP86/127, 128 and 129) of which the north-eastern section passes to the immediate rear of the site. This is shown on the Definitive Map extract below:



Pembrokeshire CC Definitive Rights of Way Map Extract

6.13 Whilst the presence of the development would be noticeable to people using these rights of way, any activity impacts would be limited and would be viewed within the context of the existing holiday complex. Due the local topography and screening along the lane and fields and the substantial tree belt and hedge bank along the rear boundary, the development is unlikely to be readily visible from these rights of way.

6.14 The proposal would protect and enhance the site's green infrastructure and the biodiversity interests of the site. The application is accompanied by a Preliminary Ecological Appraisal of the site which is attached at **Appendix D**. The Appraisal describes the survey area as a site comprising an area of amenity grassland (pitch and putt golf course), unimproved neutral grassland banks and strips of native woodland planting on the margins. The main site was deemed to be of negligible ecological value. The key findings of the survey are summarised below:

<p>Key Findings:</p> <ul style="list-style-type: none"> The main area of the site comprised amenity grassland (pitch and putt golf course) of <i>negligible</i> ecological value. Margins of the site comprised unimproved grassland on earth banks, native tree planting and native hedges. Bats are likely to use hedges and tree-lines for foraging and commuting. Nesting birds could occur in hedges and trees on the margins, reptiles and hedgehog could occur within unmanaged grassland on the site margins. The main area of site had <i>negligible</i> value to any protected or priority species.
<p>Appraisal:</p> <p>The project proposals would result in the loss of amenity grassland habitat to the new lodges and vehicle access. However, the proposals include creation of wildflower areas and new native tree planting which would deliver an overall ecological enhancement at the site.</p> <p>Risks to any protected species are very low or negligible, and can be avoided by implementing precautionary methods where appropriate.</p>

6.15 A summary of the Ecological Mitigation Recommendations are summarised below, with further details set out in Section 7 of that report:

Summary of Ecological Mitigation Recommendations (Refer to Section 7 for full details)		
<i>Construction Phase Mitigation</i>	<i>Medium - Long Term Mitigation</i>	<i>Habitat Enhancement</i>
<p>Management of amenity grassland within the site to short sward height prior to commencing works.</p> <p>Removal or trees or shrubs (if required) outside of the bird nesting season</p>	<p>Lighting design to avoid illumination of boundary hedges and trees.</p>	<p>New native tree planting around each lodge and on the north-western margin.</p> <p>Creation of new wildflower meadow in the centre of the site.</p> <p>Installation of new bat box and bird box on existing campsite building.</p>
<p>Provided that all of the measures outlined within Section 7 of this report are developed and fully implemented within the scheme, the potentially adverse ecological impacts shall be avoided or mitigated, and the site shall be enhanced for wildlife.</p>		

6.16 The above recommendations, including biodiversity enhancements, have been incorporated into the layout and design of the development. These include the additional hedge bank features around the individual holiday units, the additional planting along the lane frontage and the creation of two areas of wildflower meadow within the central part of the site. These enhancements are argued to be significant and to represent a welcome environmental benefit of the proposed development.



Photo of the existing boundary showing the well-established trees to be retained and managed

Policy 9 Light Pollution

Proposals that are likely to result in a significant level of external artificial lighting being emitted shall include a full lighting scheme and will be permitted:

- a) where the lighting proposed relates to its purpose; and,**
- b) where there is no unacceptable adverse effect on the character of the area, local residents, vehicle users, pedestrians, biodiversity and the visibility of the night sky. Wherever possible opportunities to mitigate potential cumulative impacts on the night sky should be explored.**

6.17 No significant level of external lighting is anticipated from the proposed development. The proposal would be sited adjacent to existing development at the main holiday complex and although there is various external glazing within the proposed units, it would be a low-profile and well-screened development with little impact beyond the site's boundaries. The site

would not appear prominent in the landscape with any lighting projection contained within the site.

6.18 Any additional external lighting around the site could be in the form of low bollards with any lights installed on the proposed units could be in the form of down lighters. The details of any external lighting can be controlled by condition. The design of the proposed lighting would respond to the sensitive landscape setting of the site but also to protect nature conservation interests.

Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park

Development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by:

- a) causing visual intrusion; and/or,**
- b) introducing or intensifying a use which is incompatible with its location; and/or**
- c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or**
- d) losing or failing to incorporate important traditional features.**

In assessing the impact upon the National Park, matters of detail and cumulative impact will be given special consideration.

6.19 The assessment of the potential visual impact of the development has partly been addressed within the earlier sections of this Statement.

6.20 It is suggested that the visual impact of the development would be acceptable. The proposal would involve a modest development of 10 holiday units in the form of bespoke timber lodges together with associated car parking and landscaping. The amount of built development proposed, at some 635 sqm (260 sqm for the 'Vendee' lodges and 375 sqm for the 'Edmunton' lodges), would be modest particularly when viewed within the context of a site of some 2 ha. Although other parts of the site would be partly taken up by the access track and some adjacent parking, it would retain a generally open and spacious character and appearance, reflecting its rural setting.

6.21 The proposed units would be single in form, with a height of either 3 or 3.3 metres, and given their modest proportions and overall design, any impact upon the wider landscape would be limited. The amount of car parking proposed would be limited and suitably surfaced. Appropriate landscaping and screening are proposed. The proposed development would not appear visually intrusive.

6.22 The proposal would not introduce or intensify a use which would be incompatible with its location. The proposal involves a modest expansion of an existing and well-established tourism complex and would represent a logical extension to the site. In effect, it could be

argued that an informal recreational use and simply been replaced with a more formal recreational/tourism use with some built development to facilitate that new use.

6.23 The proposal would not lose or fail to incorporate important natural features. The proposal would affect an already altered and managed parcel of land which has historically been used as a pitch and putt golf course. The proposal works with the natural slope of the site with no significant alterations required to the landform. The proposal relates to a parcel of land where the existing boundary screening would be retained and supplemented.

6.24 Careful consideration has been given to the detail and possible cumulative impact of the development. The existing tourism complex is well-established, with the granting of the more recent Certificate of Lawfulness applications confirming that the southern part of the main site for tent pitches had also become established some years ago. The layout, scale and form of development proposal is considered to represent a sensitive use of the site. To reduce the impact of the proposed development, it is proposed to make use of the existing main entrance to the site and which passes through main holiday complex. This avoids the creation of any new vehicular access off the lane and thereby the removal of any existing boundary vegetation which could have potentially made the development more visible from the lane.

6.25 As such, the proposal would not fail to harmonise with the landform or landscape character of this part of the National Park. It is suggested that the proposal would not be visually intrusive.

6.26 **Policy 29** states that all proposals for development will be expected to demonstrate an integrated approach to **design and construction**. The policy refers to compliance with other related policies which we believe we have demonstrated throughout this Statement.

6.27 The proposal involves the provision of 10 bespoke holiday lodges on the site. The proposed lodges are functional yet simple in their design which respond to the local distinctiveness of the area and would be constructed to modern day standards with high levels of energy efficiency. The materials used would be appropriate to their rural setting.

6.28 The proposed units would provide single level accommodation with easy and convenient access and would be suitable for all users. There would be parking directly adjacent with convenient access through to the main site and to the nearby play equipment and play areas.

6.29 The proposal would be served by adequate sewerage disposal facilities in the form of a modern and environmentally responsive treatment plant facility. There is no realistic opportunity for connection to be made to a mains sewerage system which is not available in the vicinity of the site. Bespoke soakaways would also be provided.

6.30 **Policy 30** specifically deals with **amenity** and aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. Whilst there are no nearby residential properties which would be directly affected by the proposal, any additional traffic on local roads would be limited, such as in any vehicles which may pass through the nearby hamlet of Tretio. The proposal is unlikely to have any material impact upon users of the nearby public right of way to the rear of the site, which is well screened by a woodland belt.

6.31 **Policy 32** states that development will be required to incorporate sustainable drainage systems for the disposal of **surface water** on site. In view of the scale and nature of the development proposed, there is anticipated to be little impact upon the overall drainage conditions in the area. The amount of new hard surfaces created would be modest with the internal access track and parking areas being constructed with permeable materials. The majority of the site would remain largely free of development, being suitably landscaped with wildflower areas being created within the central part of the site. The use of soakaways into the adjoining field is deemed to be appropriate and acceptable for this development.

6.32 It is noted that sustainable drainage systems are a mandatory requirement for new developments. Since January 2019, all new developments of more than one house or where the construction area is greater than 100 sqm will require SuDs for managing surface water and will be subject to SuDS approval by the PCC. As the construction area is greater than 100 sqm, we note that appropriate SuDS approval will be required for the development.

Policy 38 Visitor Economy (Strategy Policy)

To attract visitors outside the peak season while ensuring that the National Park environment is conserved and enhanced as a landscape of national and international importance by:

- a) Allowing limited caravan, camping and chalet development (see Policy 41).**
- b) Permitting new hotels and guest houses within Centres or through the conversion of appropriate existing buildings in the countryside.**
- c) Protecting against the loss of hotels and guest houses unless it is proven that their continued use would not be viable or that peak demand can continue to be met in the locality (see Policy 39).**
- d) Only permitting self-catering accommodation where the site or building is not appropriate for market or affordable housing provision on brownfield sites in the Local Development Plan's Centres or in conversions in the countryside (see Policy 40).**
- e) Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.**
- f) Directing shore-based facilities to the developed stretches of coast where compatible with adjacent uses (see Policy 17).**

Activities which would damage the special qualities of the National Park will not be permitted (see also Policy 8). The potential effects of development on Natura 2000 sites will be considered in accordance with Policy 10.

6.33 It is suggested that the opportunity to stay in the proposed lodge units would meet the objective of Policy 38. In accordance with associated Policy 41, it can be seen this type of tourism accommodation development can be acceptable in countryside locations. The proposed bespoke units would provide a high standard of accommodation with two different types/sizes of accommodation being proposed. The proposed units would include modern levels of insulation with all the facilities required for cooking and washing.

6.34 The type of accommodation proposed would attract visitors outside of the peak season whilst ensuring that the National Park environment is preserved and enhanced. The proposal

relates to the expansion of an existing tourist facility with convenient access to nearby tourist attractions and local beaches. Occupiers of the site would have convenient access onto the local public right of way network which passes close to the site. There would be convenient access directly onto the local public rights of network.

Policy 41 Caravan, Camping & Chalet Development

New caravan, camping and chalet sites and changes of pitch type within sites will be considered away from the coast and Preseli's and in locations not inter-visible with them.

Extensions to existing sites will be considered where the extension is in a well screened location.

Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvements in relation to landscaping and layout will be permitted where existing sites have highly prominent parts often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discreet locations.

Proposals coming forward as set out above must ensure that units are sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect on the National Park landscape (see Policy 16);

a) New development (including ancillary facilities) and changes within sites avoid sensitive locations

b) There are no unacceptable adverse cumulative effects when considered in conjunction with other development in the locality (see Policy 16).

c) Any ancillary facilities should, wherever possible, be located in an existing building or as an extension to existing facilities. If no existing building is available, the need for additional facilities must be clearly demonstrated and commensurate with the scale of development (see also Policy 40).

d) Enhancement opportunities achieve an overall environmental improvement whereby there are clear benefits in reducing the impact on the surrounding landscape.”

6.35 The above policy is a key consideration in the assessment of the proposal. The proposal would involve a modest expansion of an existing tourist facility at the site located a short distance off the A487 which links St. David's and Fishguard. In our view, the development is in a discreet location away from the more open and prominent coastline and the Preseli's and would not be inter-visible with them.

6.36 The site is not considered to be in a highly sensitive or prominent location within this area of the National Park. The policy states that the expansion of existing sites will be considered where the extension is within a well-screened location. The site is considered to have a high degree of visual enclosure with the only clear views being possible when passing the site along the lane.

6.37 There are few other caravan or camping sites in the immediate locality and the proposal will not therefore have any cumulative impact on the character of the locality or wider National Park. Whilst there is the Hendrie Eynon Caravan and Camping site a short distance to the south-west, other sites are a significant distance away. For example, there is the Celtic Camping and Bunkhouse site closer to the coast to the north-east, the Lleithyr Farm and Meadow Holiday Park to the north-west of St. David's, and the smaller Spring Meadow Farm camp site to the north of Caerfarchell close to the A 487.

6.38 Apart from the holiday lodges themselves, no additional ancillary buildings are required or proposed as part of the development. The proposal is conceived as a sustainable form of visitor accommodation with minimal impacts from built form or the setting of the locality.

6.39 The proposal delivers clear and significant environmental improvements, such as in terms of ecological enhancement. The proposed landscaping is significant in extent particularly when seen within the context of the modest scale of development proposed. As already noted, the applicant has already carried out a significant amount of tree planting (2000) around the site's boundaries over the years. The proposed landscaping and additional native planting would help assimilate the development into its sensitive landscape setting.

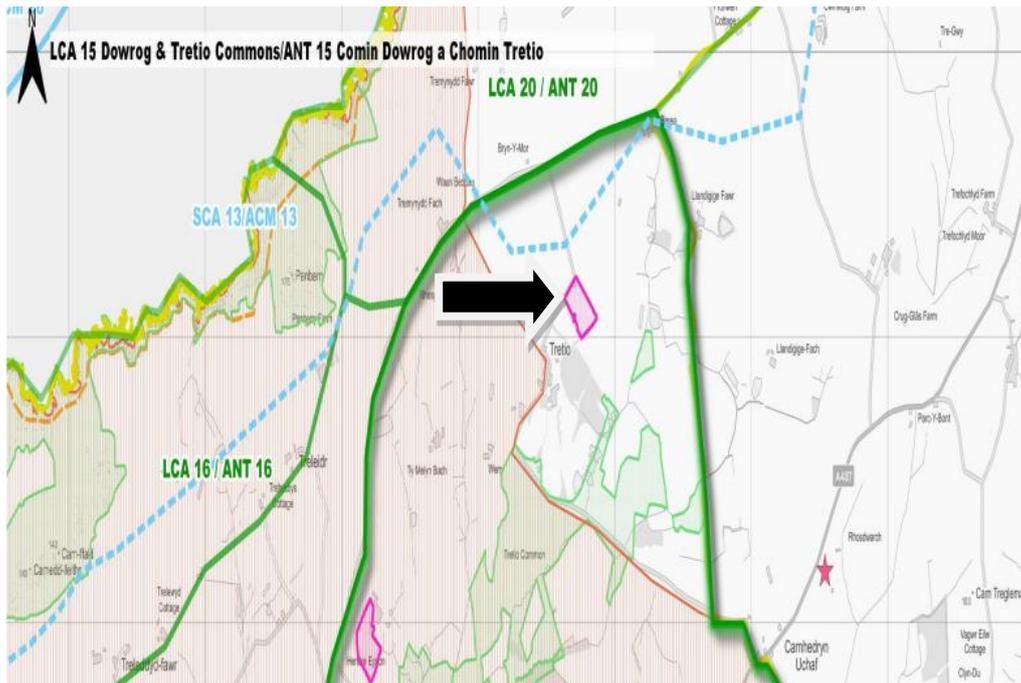
6.40 Para 4.212 of LDP2 states:- *"The Caravan, Camping and Chalet Landscape Capacity Assessment provides both generic and detailed advice on what is meant by terms such as 'away from the coast and Preselis' and 'sensitive locations', how to assimilate proposals into the landscape and how to mitigate and enhance. The tailored recommendations and guidance for each landscape character area takes precedence over the generic guidance on siting, mitigation and enhancement which is set out in Appendix B to the Assessment"*.

6.41 Table 7 and related paragraphs refer to the different categories and scales of Caravan, Camping and Chalet development considered under the Landscape Capacity Assessment. In this instance, given the size of the site and the type of development proposed, the application falls into the category of:

"Static -Medium Static units including caravans, chalets and pods/hard structure glamping options on a site 0.5- 3ha"

6.42 This application site falls within Landscape Character Area 15 which covers the 'Dowrog and Tretio Commons' area. The site is located towards the northern part of this LCA and outside of any designated Seascape Character Area (blue dotted line - which just enters the extreme northern area) and the Registered Landscape of Outstanding and Special Interest (hatched brown). There are areas of Common (hatched green) to the south of the hamlet of Tretio which are designated as a Site of Special Scientific Interest (SSSI) but these would not be affected by the proposed development. The location of the site in relation to the LCA is provided below:

<p>Pembrokeshire Coast National Park Authority</p> <p>Pembrokeshire Coast National Park Local Development Plan 2</p> <p>Caravan, Camping and Chalet</p> <p>Supplementary Planning Guidance</p> <p>Consultation Approval Date: September 2020 Adoption Approval Date: May 2021</p>
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Extract of LCA 15 - Caravan, Camping and Chalet Landscape Capacity Assessment (May 2021)

6.43 The following is the Summary of sensitivity of LCA 15 – *‘The sensitivity of the area lies in the open undulating slopes, highly distinctive small settlement pattern, open commons with nature conservation value, historic character and value and strong sense of place.*

6.44 In terms of the ‘sensitivity measures’ to the different types of development, whilst this is considered high for large static developments, it is considered high/medium for medium static developments which is proposed in this application.

6.45 The key sensitivities and characteristics which make the area of LCA 15 sensitive to development is provided below:

The following characteristics make the area sensitive to development:

- Undulating sloping areas open to wider view.
- The open character of much of the landscape with low hedge banks or hedges or no hedge cover, including the disused airfield.
- Distinctive small settlement pattern including the Conservation Area and its setting at Caerfarchell.
- The majority of the area is included in the St David’s Headland and Ramsey Island Registered Landscape of Outstanding Historical Interest which indicates the highly distinctive historical and cultural character of the area.
- Open commons with strong sense of place as well as internationally important heathland and grassland habitats.
- A small part of the area to the north has strong intervisibility with the sea.
- The value of the area lies in its National Park status and the historic and nature conservation features mentioned above.

6.46 Given the location of the site away from the coast, many of the key sensitivities would not be affected by the proposal. For example, the site is away from the coastal cliffs and headlands and would not affect the SSSI or any historic sites or features, or their setting. The St. David's Headland, Seascape or Registered Landscape designations would not be affected.

6.47 The application site is currently of open character, but its landform and appearance has been significantly affected by its use as a pitch and putt golf course (i.e. brownfield site). The site is on a slight slope, however, the boundary has well-established trees and this significant screening means it is not readily visible in wider landscape views and in this case, would not have a particularly strong inter-visibility with the sea. The proposal would not the distinctive settlement patterns in the area.

6.48 In terms of the capacity for new development, this is deemed to be '*limited*'. However, the LCA clearly indicates there is some scope for some development, including for small static sites, further back from the coast. It states the following:

Summary of Capacity

'The area has limited capacity because of its generally high / high / medium sensitivity and open undulating landscape with commons and a particular sense of place and historical character. The historic landscape limits static development. There may be limited capacity for extension of existing sites provided they are contained within mature hedges / trees or for small seasonal sites.'

Capacity for extensions to existing sites (increasing accommodation)

'There may be limited capacity for extension of existing sites provided they are contained within mature hedges/trees. The extensions would best be for seasonal use, but a small number of static caravans may be acceptable provided there is strong screening.'

6.49 The application involves the provision of a medium static site, as an expansion to an existing tourism facility. The proposal would clearly fall within this category of development which can be acceptable. The proposal would not involve the stationing of static or touring caravans which can have a far greater visual impact upon an area. In our view, the proposal would represent a limited development and the site benefits from strong screening.

6.50 There is important advice concerning siting and mitigation guidance specific to the LCA which may be directed to existing sites within the LCA but which would relate to any proposals for additional holiday accommodation covered by Policy 41. The proposal would comply with many of the guidelines for the following reasons:

- The proposal is sited in an area enclosed by landform, mature trees and hedges both within and adjacent to the site and is physically and visually closely associated with the main holiday complex.
- The application site comprises a pitch and putt golf course and would not therefore affect unimproved pasture or semi-natural habitats.
- The proposed units have been positioned close to the edges of enclosing elements, such as field boundaries and woodland belts, with the central part remaining open and

free of development. Whilst close to the boundaries, the proposed units are sufficiently distant not to affect the long-term retention of screening.

- The proposal avoids the historic landscape and would not affect the setting of any conservation areas, ancient monuments, listed buildings or their curtilages.
- Careful attention has been given to reducing the density of the development, not only in proposing 10 modest units of accommodation but by incorporating a significant amount of open green space as part of the layout of the development. Increased native tree and shrub planting is proposed to help break up the development and mitigate visual impact.
- The proposal maintains, reinstates and enhances the field boundary pattern including traditional hedge banks, hedgerows and trees to help filter or screen views into the site.
- A package of measures are proposed which would significantly enhance the biodiversity value of the site.
- Any external lighting would be kept to a minimum and where installed, the type of lighting would be downward fencing to minimise their impact.
- Whilst there is no proposal to alter or improve the main site entrance, this is not considered to harm the local character or appearance of the locality.

6.51 It is therefore concluded that, whilst the proposed 10 timber holiday lodges would lie within the LCA15 the document indicates that there is scope for this type of development, albeit limited, and where they are well screened and outside of the more sensitive coastal areas of the National Park. The proposal should be viewed within the context of existing holiday complex and given the layout, siting and form of development proposal it can be satisfactorily assimilated within the landscape.

6.52 **Policy 59** seeks to achieve sustainable patterns of development. In particular, it seeks to ensure that new development is well designed by providing appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate, and to not permit proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (Policy 60).

Policy 60 Impacts of Traffic

Development will not be permitted where:

- (a) **Appropriate access cannot be achieved; or**
- (b) **Traffic likely to generate an unacceptable adverse effect on congested areas or at times of peak traffic flows; or**
- (c) **Traffic is likely to be generated at inappropriate times such as late at night in residential areas; or**
- (d) **Where there is an unacceptable adverse effect on road safety; or**
- (e) **Where significant environmental damage would be caused and cannot be mitigated; or**
- (f) **The proposal would undermine the vitality and viability of a Centre.**

A Transport Assessment will be required for proposals likely to have significant trip generation or where the National Park Authority has significant concerns about possible transport impact of the proposed development.

6.53 Having regards to supporting paragraph 4.325, we do not believe that due to the scale of development proposed that a Transport Assessment is required in this case. However, we have enclosed the Authority's standard transport form at **Appendix E** to this submission.

6.54 It is proposed to make use of the existing main vehicular access to the holiday complex, which is located towards the far north-eastern corner of the site. In view of the modest scale of development proposed, in comparison to the existing tourism accommodation, it is not considered that the existing access would need to be modified or improved. The existing access road through the site is also considered adequate and suitable to accommodate the modest scale of development proposed, without affecting occupiers of the existing holiday complex.

6.55 It is suggested that the amount of additional traffic generated by the development would be relatively modest and is unlikely to significantly affect the existing traffic and highway safety situation. Adequate car parking is provided as part of the development, commensurate with the scale and type of development involved.

6.56 The site is suitably located in relation to the local road network and the proposal is unlikely to affect the vitality or viability of a nearby centre, such as St. David's. The holiday complex can be reached from several directions, including via lanes off the A487 to the south at either Carnhedryn to the south or Groesgoch further to the east, or from the north off a road which heads north-east east out of St. David's which also serves Abereddy and Porthgain.

6.57 We are not aware of any traffic safety issues associated with the operation of the existing holiday complex. Whilst the site is reached via country lanes, we do not consider that any environmental damage would be caused by the proposed development.

7.0 PLANNING POLICY WALES – FEBRUARY 2021

7.1 *Planning Policy Wales: Edition 11* 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 these documents.

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. For the reasons set out earlier in this Statement, the proposal is deemed to be of a layout, scale and design that respects the character of this acknowledged sensitive rural location. The proposal is also considered to generate the following positive outcomes:

- The proposal is a sustainable form of development, in that it specifically relates to the sensitive expansion/enhancement of an existing tourist site.
- Social and cultural well-being benefits, in that it would provide a modest expansion of a successful family run business and which would increase the tourism offer in the local area. The proposal would contribute to meeting the growing demand for tourism accommodation in this part of Wales, particularly since the impact of the pandemic.
- There are a number of economic benefits, such as providing additional income stream to the Caravan and Camping Park in the medium and longer term; employment during the construction period and in the building supply industry; and extra visitors to the site would provide additional spending in the local community and support facilities and services in nearby settlements and various visitor attractions. The proposal is likely to generate some further local job opportunities.
- The siting, scale and design of the proposal would minimise its visual impact on the landscape character and amenities of the area. The proposal would maintain a low-key tourist use of the land. The nature conservation and biodiversity interests of the site would not only be safeguard but significantly enhanced. The proposal is considered to at least conserve the overall special environmental qualities of the area of this part of the National Park.

7.4 The sections on **Tourism** and the **Rural Economy** are relevant.

7.5 In **tourism** terms, **paragraph 5.5.1** advises that *“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.”* **Paragraph 5.5.2** advises that *“the planning system encourages tourism where it contributes to economic development, conservation & rural diversification...while recognising the needs of visitors and those of local communities”* whilst **paragraph 5.5.3** advises that *“in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy...Development should be sympathetic in nature and scale to the local environment”*.

7.6 In discussing the **rural economy (para 5.6.1)** advises that *“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”*.

7.7 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/enhancement to an existing business, would offer further economic advantages to the wider community both in terms of job creation and from attracting more guests to the area. The development is considered acceptable from an employment policy perspective.

7.8 It is submitted the application is strongly supported by the above national policies and advice. The proposal would involve the modest expansion of an existing and well-established tourism complex within an attractively and sensitively designed development located on the edge of the main site.

8.0 CONCLUSIONS

8.1 This application involves the change of use of a site in use as a pitch and putt golf course (brownfield site) and its development with the provision of 10 bespoke self-contained holiday lodges. The proposal would include associated car parking, supplementary tree planting and landscaping and biodiversity enhancements.

8.2 The application seeks the modest expansion of an existing and well-established holiday complex at Tretio to the north-east of St. David's. The existing complex comprises a mix of holiday accommodation and facilities including static caravans, tent pitches, a reception/facility building, play equipment and a play area.

8.3 The site is situated within a sensitive landscape setting, falling within the 'Dowrog and Tretio Commons' Landscape Character Area. The LCA indicates that the site is within a landscape which is regarded to have a 'high/medium sensitivity' but that there is scope for some further limited development within the area, such as the expansion of existing sites, and where they are well screened. The site is located towards the northern part of the Character Area but still away from the more sensitive coastal edge and the Pembrokeshire Coast Path.

8.4 The proposal would involve the expansion of an existing Caravan and Camping Site and which would be limited in the amount and scale of development proposed. The proposal would affect a previously altered and managed parcel of land having been in use as a pitch and putt course for some 25 years. It does not therefore involve encroachment into an open field. The proposal is deemed to be well-conceived and anticipates an attractive layout and form of development, representing a high-quality and sustainable development.

8.5 The proposal is not considered to be visually intrusive. The location of the site, local topography and high degree of strong visual enclosures, any potential views within the wider landscape would be very limited. The scale and nature of the proposal would have a low profile and would be satisfactorily assimilated within its landscape setting. The proposal would retain an open and spacious character. The proposal has full regard to the purposes and duty of the National Park.

8.6 The scheme is considered to meet the objectives of the adopted LDP in particular **Policy 41** which seeks to regulate new development on camping, caravan and chalet sites through measured and sensitive outcomes, **Policy 1** through the conservation and enhancement of its environment whilst simultaneously promoting its greater enjoyment, and **Policy 14** which seeks to protect and conserve the environment of the National Park.

8.7 In addition, because of the very specific circumstances surrounding this site, permission for 10 luxury timber lodge units should not be viewed as a precedent. Nor can this proposal be seen to have a cumulative impact as there are no other comparable holiday accommodation units in the near vicinity. The proposal is very modest in its scale and is argued to represent a logical extension to the existing facility and which would help further diversify the type of holiday accommodation offer at the site and in the locality.

8.8 As identified in the submitted Preliminary Ecological Appraisal, implementing the recommended mitigation measures avoids the potentially adverse ecological impacts and the site would be enhanced for wildlife. This is a significant and welcome benefit of the proposal.

8.9 There are not considered to be any highway safety, neighbour amenity or infrastructure/drainage issues likely to arise as a result of the proposed development.

8.10 The proposal is considered to have significant planning merit. It is therefore respectfully requested that permission be granted for the scheme as proposed.

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

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APPENDICES