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3<sup>rd</sup> August 2021

Dear Mrs Gandy

**Rowston Holiday Park, New Hedges, Saundersfoot, Tenby, SA70 8TL  
Pre-Application Enquiry**

**Proposed Upgrade and Expansion Of Rowston Holiday Park With On & Off-Site Enhancements Including Tree Planting And Ecology  
Major Application**

Hayston Development and Planning Ltd has been engaged by The Hean Castle Estate, Saundersfoot, Pembrokeshire SA69 9AL to investigate the possibility of a planning consent for the upgrade and expansion of Rowston Holiday Park with additional static caravans by way of conversion from Tents and Tourers, and on-site enhancements.



***Aerial photograph of Rowston Holiday Park Land which is the subject of this pre-application***

## 1.0 INTRODUCTION

Rowston Holiday Park is set on the edge of the village of New Hedges, mid-way between the resort towns of Saundersfoot and Tenby, with excellent access from the A478.

The site enjoys the best of all worlds in terms of its location – The access is quick and easy from the main road network, whilst it sits at the head of a wooded valley with distant views of the sea. Just outside the entrance of the park is the centre of the village of New Hedges, which contains a small supermarket with Post Office, several pubs and a garage. A private footpath leads from the Park, down the valley to join the Wales Coast Path and quiet beach at Waterwynch.

The Park has a number of buildings on site, including an office, several shower blocks, a building previously used as an amusement arcade and food outlet, and a workshop / maintenance building.

There is current planning consent for 133 Static Caravans and 92 Tents and Touring Caravans.



*Aerial photograph of Rowston Holiday Park in relation to New Hedges and other Caravan Sites*

## 2.0 CURRENT POSITION

Rowston Holiday Park was taken back in hand by the Estate from a long-term tenant in November 2019. The Estate has significant experience in the Holiday Park business, Scar Farm in Saundersfoot is a successful business with 145 Static Caravans, which has always been run in hand.

Rowston has been set up as a distinct cost centre within the Leisure Division of the Estate business alongside Scar Farm, Foundry Point, the Holiday Cottages, Netherwood House and the Coppet Hall Beach Centre.



***Print Screen of front page of Scar Farm website <https://www.hean-castle-estate.com/scarfarm>***

The Park is being run in the same manner as the other sites in the Estate's Leisure Division. It is overseen and managed on a daily basis by the Leisure Division Manager and her assistant, with the finance function being provided by the existing Estate finance team.

The onsite team, who operate from the existing office / reception building, consists of a Duty Manager and 2 Groundsmen who have been very busy removing abandoned caravans, tracing services and utilities, and getting the landscaping back into order.

The Park Office has been refurbished, and the Children's playground, which was a health and safety hazard, has been replaced.

The utilities and service provision across the Park have been found to be seriously inadequate, in fact the gas distribution system was immediately condemned on inspection by a qualified engineer, and all caravans have been converted to run on bottled gas instead.

The caravans are not sited on appropriate pitches, but in fact just on areas of loose gravel, with no proper support. The road network is totally inadequate for the volume of traffic the permitted numbers would generate.

A number of overly tall Macrocarpa trees have been removed which were starting to shed branches, as well as becoming unstable in high winds. As part of the Estate's wider forestry business, the field to the north east of the site was planted with trees 2 years ago.

### **3.0 PROPOSITION**

Bratherton Park Design, who designed the highly sought after 'Zealand' area of Scar Farm for the Estate, have been engaged to come up with an outline new design for the site, but taking in the tent and touring area as well to increase the number of static caravans.

Unfortunately, by the time the larger footprint of modern caravans, together with the correct spacing was taken into account, they were unable to achieve a satisfactory layout, even if the area currently with consent for tourers and tents were included. They estimate that to achieve the type of layout we are looking for, on the existing site area, we would need to reduce numbers to around 100 – 110 statics only.

This would clearly not be ideal in terms of revenue foregone, impacting on our ability to deliver the first class site this location deserves and so, having taken account of the provisions of the recently adopted PCNPA Local Development Plan 2 and associated Supplementary Planning Guidance, Brathertons have been asked to produce an indicative layout, to include the fields lying to the north of Rowston, and currently let to the tenant of Lodge Farm, in order to open discussions with the PCNPA as Planning Authority.

This proposal is based upon the existing permitted 133 Statics, together with the conversion of the 92 existing tents and tourer permission to additional statics. Even with this increased number of caravans, when added to the additional land area, this results in a low density per hectare, allowing for substantial landscaping and wildlife habitat within the site perimeter, in addition to the wider off site 'Landscape Scale' proposed tree planting.

We are aware that this is a significant scheme, but hope that the large scale of the landscaping / screening element (which could be further increased if necessary) together with the Estate's reputation for producing high quality developments will create an 'exemplar' of how the provisions contained in LDP2 can be successfully translated into high quality, low density, eco-friendly Caravan Park development.



**Scan of submitted drawing showing the existing layout**

The concept plan of ideas (page 7) shows the wider area proposal more clearly:

- The area outlined in Pink is the current area of Rowston.
- The area outlined in Orange are the agricultural fields adjoining that are currently let together with Lodge Farm. They currently have a license to site some tourers along the northern edge of the largest field.
- The areas in solid green are existing woodland /planting, the areas hatched green are proposed new tree planting / wildlife corridors (The proposed new planting as shown amounts to 13 acres).
- The grey line between points 'A' and 'B' represents a new road to be created to provide improved access to the adjoining agricultural fields, and also to Rowston Farmhouse. The new road would use only existing gateways and gaps in hedges, with the exception of the final access onto Trevayne Lane, which would be a new gateway.

However, the existing gate into this field, opposite Clicketts Heath House, would then be blocked up. The existing access to Rowston Farm would be subsumed into the site.

- The 'Modern' Agricultural buildings at Rowston Farm 'C' are proposed to be demolished, whilst the traditional stone-built cowshed is proposed to be converted to residential accommodation for the Site Manager. This is likely to be a separate detailed planning application submission.

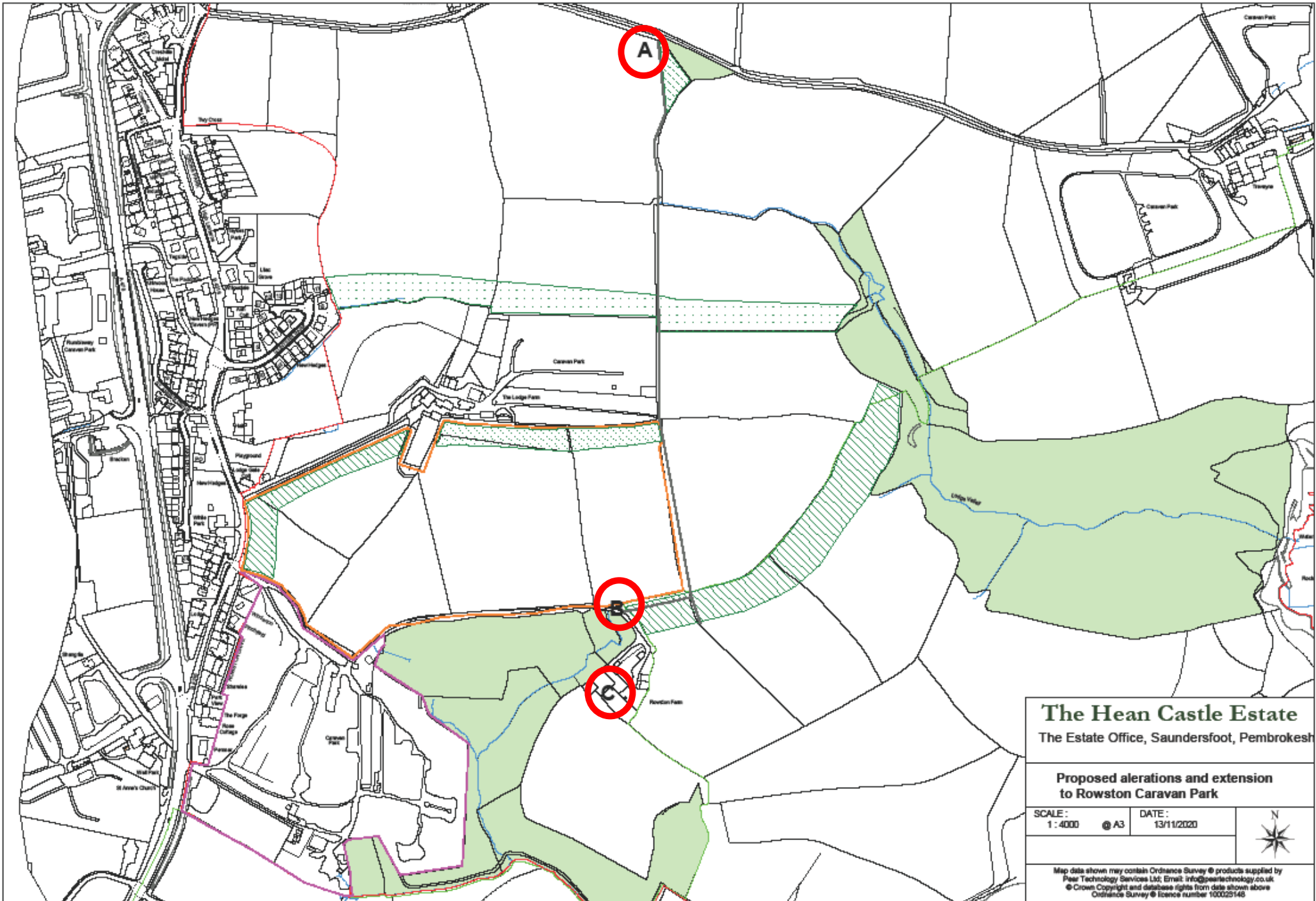


***Buildings to be demolished at Rowston Farm***



***Old Stone Cowshed building to be converted to accommodation for Site Manager***





**The Hean Castle Estate**  
 The Estate Office, Saundersfoot, Pembrokeshire

**Proposed alterations and extension to Rowston Caravan Park**

SCALE: 1:4000	@ A3	DATE: 13/11/2020
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#### 4.0 NOTABLE SCHEME BENEFITS / PLANNING CONSIDERATIONS

- Significantly reduced caravan density on Rowston site – the expanded area is visible from very limited areas on land, and once existing and proposed planting has grown, hardly at all from land or sea.
- Reduced density and removal of regimented layout, will make for a much more attractive site.
- Reduced traffic through the village of New Hedges from a significant reduction in touring caravans. HGV deliveries, including caravans, would be via the existing southern access to the existing site directly from A478 to a purpose-built unloading area.
- All agricultural machinery serving Rowston Farm (which is let to a non-resident tenant) would be taken out of the village and use the new access from Trevayne Lane instead.
- The current 'low key' appearance of the site access to Rowston will be retained, whilst being improved to current standards, which will also improve access for residents of Rowston Drive, which shares the site entranceway.
- Protection of existing jobs, and creation of others – At present there is 3 full time and 3 part time which will increase to 5 full time and 5 part time.
- All Caravans going onto the site will be clad in 'Canexel' or similar Matt finish, in a variety of colourways as shown:



- All park lighting will be low energy, downward projecting, bollard style.



- No new buildings to be constructed. Existing amusement arcade / food outlet building to be demolished. The launderette to be relocated into traditional stone-built toilet block.



*Pictures showing existing Amusement Room / Launderette / Diner to be demolished*

- The existing field boundaries in the enlarged area will be retained as far as possible, with only gateways being made where necessary. Additional planting will be applied to these boundaries to improve their wildlife potential.
- Large areas of additional planting are to be undertaken around the existing and proposed new development, to break up the views of caravans, together with providing a 'parkland' feel to the site.
- 'Landscape scale' off site planting to provide enhanced screening and wildlife mitigation measures, together with 'wildlife corridor' linkages to existing woodland plantations.
- All parking spaces to have provision for EV charging points, the electric infrastructure on the park to have capacity for 'all-electric' caravans in future, to enable the use of LPG to be phased out.
- The likely cost of a development of these proportions is in the region of £6, 500,000. The Return on Investment (ROI) is excellent, which will enable the Estate to progress several other high-quality projects for which we already have consent, in fairly short order creating further jobs, and expanding the range of high-quality accommodation provision in the area. **Appendix C** is a simplified project Investment/cash flow and predicted income over the first 15 year period.
- The main contractor for the construction of the site will be a long established, reputable, Pembrokeshire based company, employing a high percentage of local labour.
- The lack of on-park facilities and will encourage holidaymakers to utilise local facilities within the village, together with those further afield in Saundersfoot and Tenby, thus supporting local businesses.

- The bus stop outside the Park entrance will encourage visitors to use public transport, rather than their own cars, particularly when visiting Saundersfoot or Tenby.
- In respect to the Green Wedge designation to the north of Rowston, the proposal includes extensive tree planting and ecological enhancements which will improve its status as a Green Wedge.

For comparison purposes, the 'Zealand' area of Scar Farm, Saundersfoot (picture below) has a similar style of layout to what is proposed. But at a higher density, being 53 units on 2.4ha = 22.08 units/Ha



***Existing principal entrance in New Hedges to be sympathetically enhanced – Entrance from A478 to be for HGV access only.***

#### 4.0 OPTIONS FOR PROPOSED EXPANSION (FIRST DRAFT)

There are three main elements to the proposal relating to the provision of holiday accommodation at Rowston, all of which are shown on the attached Plan 1381/6 (Rev C):-

- **Area A** – within the existing boundaries of the Park consent exists for 92 pitches for either touring caravans or tents. It is intended to replace this consent with 29 static caravans - thus substantially enhancing the attraction of this part of the site for staying visitors.
- **Area B** – again within the existing boundaries, consent for 133 statics. It is intended to replace the 133 statics with 70 static caravans - thus substantially enhancing the quality of this part of the site for staying visitors.
- **Area C** - Planning permission is sought for 126 static caravans in a northern extension.



As a result of the reduction in the number of pitches in area A and B by 63 pitches – giving a total reduction of 126 pitches, the overall number of licensed units at the Park would remain the same, but with no provision for Tents or Touring Caravans.

The total of 126 statics within the proposed northern extension (Area C) would result in a low density site which would allow for substantial landscaping and wildlife habitat complementing the wider off-site planting, of which some has already taken place, and a significant amount more is proposed. This respects the Green Wedge Designation and seeks to enhance this area.

Improvements are proposed to the existing access north of Highway / Rowston Drive which would remain the entrance and exit point for all visitors. Leaving the southern access which is directly from the A478 for use only for the delivery of caravans and for access to the Dwr Cymru Foul Pumping Station.

### **Overall Landscaping and Ecological Enhancements**

Substantial planting would also take place both within and around the northern and western boundaries of the site with the intention of both enhancing the biodiversity of the site and of screening the additional caravans. Three wildlife ponds are also envisaged, which together with a number of other enhancements to the existing site, will increase the attraction of Rowston to visitors. The proposed layout of site roads and pitches in the area of the extension allows for the retention of the majority of existing hedgerows as well as breaking up views of other caravans. 'Landscape scale' additional planting, amounting to approximately 13 acres is proposed on the otherwise sparse agricultural land to the East of the proposed site.

It is intended to develop the proposed extension to the north over a period of four to five years which would allow the proposed planting to have taken shape before full occupancy has taken place.

The nature of the proposed planting, including preferred species, locations, densities and timescale would be set out in a separate management plan to accompany the planning application.

It is also proposed to provide all parking spaces within the site with capacity for EV charging points and for the electric infrastructure on the Park to have capacity for 'all-electric' caravans which would also have the benefit of being able to phase out the use of LPG.

This can be expanded with provision with a Landscape Ecological Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) with the formal submission.

## **5.0 CURRENT PLANNING CONSENT**

There is current planning consent on the Rowston Holiday Park for 133 Static Caravans and 92 Tents and Touring Caravans.

## **6.0 CURRENT NATIONAL PARK AUTHORITY PLANNING POLICY**

The current Local Development Plan was adopted by the Pembrokeshire Coast National Park Authority in September 2020. It is suggested that the following are the most relevant policies concerning the potential upgrade and expansion of this well-established holiday park, namely; Policies 1, 8, 9, 14, 16, 38 and 41.

### **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.**

It is considered that on balance the proposed extension of the existing Rowston Holiday Park is compatible with the two aims of the National Park's recently adopted LDP2 taken with the need to foster the economic and social well-being of the New Hedges community particularly by:-

- Enhancing the experience of those visitors staying at the Holiday Park reducing the density of caravans within existing areas of the site, by improving the road layout and demolishing a number of buildings which are no longer fit or required for their original purpose.
- Upgrading the quality and capacity of the electric infrastructure to provide for all vehicle parking spaces to have provision for EV charging points and to have the ability to cater for all electric caravans.
- Undertaking a comprehensive programme of planting both within the current area of the Park and around the boundaries of and within the proposed extension and with an extended depth of planting along the western boundary parallel with the road through New Hedges. The increased planting will assist in both strengthening and diversifying local ecosystems / wildlife corridors as compared with the current open pasture land.
- Providing and securing additional local jobs (estimated at 6fte) through improved management and operation of the existing Park and of the proposed northward extension. Works to deliver the proposed extension will require an additional labour force which will be involved the construction of improved internal roadways and parking spaces, create and service the pitches for the caravans and to landscape and plant trees and bushes for screening and amenity purposes. Purchasing and maintaining the new caravans to replace the old, and to enlarge and improve the site's infrastructure will also create manufacturing jobs within the associated supply industries.

**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.

It is considered that the impact on the special qualities of the National Park by the proposal will be limited as:-

- There are a number of caravan and tent sites both within the National Park and outside the Park in the New Hedges area and therefore by implication the concepts of remoteness and tranquillity have already been compromised in this particular location by such developments
- From initial inspection it would appear that the area proposed for the expansion of the Rowston Holiday Park would take place on land which is under pasture and has no special status in terms of biodiversity. Such an initial assumption will however be tested through an Ecological Survey to be undertaken by an appropriate local consultant.
- Recent planting to the west of Rowston farm, together with extensive proposed planting on the agricultural land to the east of the site will assist in screening the site of the proposed expansion of the Holiday Park.



*View from track to Rowston Farm looking north towards Lodge Farm Holiday Park  
Site of proposed extended Rowston Holiday Park*

**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.

It is the intention to include a full lighting scheme with the submitted application and one that will reflect:-

- The need to light pathways through the site for safety reasons
- Reducing the impact of such lighting by using downlighters

The proposals do not include any extensive reception building or new entertainment facilities. Entertainment for any visitors will be off-site and will therefore benefit the local economy; particularly that of New Hedges, Saundersfoot and Tenby.

**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.**

In the case of Policy 14 it is considered that the visual intrusion of the proposed extension to an existing caravan and tent park, where there is limited increase in the number of pitches for overnight accommodation, would be limited as the extension lies between the existing Rowston Holiday Park and Lodge Farm Holiday Park to the north and because of the substantial planting proposed along the western and northern boundaries of the extension which would screen the site from passing traffic.

Because of the land form and the substantial planting programme (equivalent to 13 acres) it is unlikely that the proposed expansion of Rowston Holiday Park will be seen by those walking the Coast Path between Monkstone Point to the north and Waterwynch to the south. It is also considered that the extension of the Holiday Park would not be separately identified when viewed from a point in Saundersfoot Bay as the nearest part of the site to the shoreline is 0.5km



*View from track to Rowston Farm looking across area of proposed expansion*



**Policy 16 Green Wedges**  
In order to prevent the coalescence of Centres, protect the setting of Centres and safeguard the countryside Green Wedges are designated at the following locations:.....

**GW18 New Hedges east of B4316** - the plan adjacent shows the area to the south of The Lodge Caravan Site and to the north of the track to Rowston Farm, as far to the east as the first hedge-line.

Whilst the Green Wedge equates to the area of the proposed planting on the western boundary of the site and the first 9 or 10 proposed caravans, the concept of this particular 'Green Wedge' is to counter any proposals to 'infill' between the current northern boundary of Rowston and the southern boundary of The Lodge.

It is considered that the advantages accrued, by way of enhancing the quality of the existing Holiday Park and the proposed high density tree and shrub planting programme on the western north boundaries will bring benefits for local ecosystems and more than compensates for the loss of the Green Wedge, and indeed enhances part of it on this boundary.



Indeed, there have been several precedent cases where PCNP has allowed development on a Green Wedge Designation due to greater material planning considerations such as the provision of affordable housing (i.e. Marloes), local needs housing (i.e. Nolton) and a community hall (i.e. Manobier).

**Policy 29 Sustainable Design (Strategy Policy)**

**All proposals for development will be expected to demonstrate an integrated approach to design and construction, and will be required to be well designed in terms of:**

- a) Place and local distinctiveness (see Policy 8).**
- b) Environment and biodiversity (see Policy 8).**
- c) Community cohesion and health (see Policy 30).**
- d) Accessibility (see Policy 59).**
- e) Efficient use of energy**
- f) Energy generation (see Policy 33).**
- g) Materials and resources (see Policy 31).**
- h) Water and drainage (see Policy 33).**
- i) Waste (see Policy 31).**
- j) Resilience to climate change (see Policy 34)**

With regard to Policy 29 it is suggested that the approach described by the applicant meets the above criteria insofar as:-

The improvements to the existing site can only be achieved through considering the beneficial changes to the established site and the proposed expansion to the north as a single concept.

Since acquiring the lease in 2019 the site owners have undertaken substantial improvements to the Rowston site including removing older caravans and re-seeding those pitches, reconstructing the play area, and undertaking extensive tree maintenance work. Further improvements are also proposed including the demolition of surplus buildings and reducing the density of caravans – all of which will be static caravans.

All of the above proposals, if implemented would result in the loss of 126 pitches. In order to maintain the number of pitches it is proposed to develop land between the current site and the Lodge Park Caravan Site to the north but with the same high standard. The layout proposal by designers, Brathertons, delivers an integrated approach to both design and construction across the older and the proposed new parts of the Park. A colour palette for the proposed caravans is also suggested as a way of mitigating the impact of Caravans within the landscaped Park, and more broadly within the National Park.

These improvements, particularly in the proposed lower density of static caravans, together with the proposed planting, should improve the feeling of well-being within the Rowston Holiday Park experience and contribute to a more sustainable / eco-friendly approach.

In terms of biodiversity, the current design incorporates substantial planting both within the old and new elements and along the borders of the site (an ecologist has been engaged and this will be designed and incorporated into the proposed scheme). The NPA's advice would be

sought on the most appropriate species to plant that would deliver both screening and biodiversity.

With regard to accessibility, the site lies to the east of New Hedges with a frontage to the B4316 which connects to the A478 Tenby to Kilgetty road and hence very convenient to those visitors using the M4 / M5 - A40 - A477 for their short or longer break to south Pembrokeshire. Exchanging touring caravan / tent pitches for static pitches will reduce the number of towed caravans and trailers with tents passing through the village.

As part of the general upgrade of the existing site and as part of delivering a low carbon profile, it is intended to install electric car charging points throughout the Holiday Park.

Also as part of the enhancement of the existing Holiday Park and as part of the proposed expansion, the associated infrastructure of roads and services, including foul and surface water drainage will be updated / designed to cater for current and future needs.

#### **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.**

With regard to the above policy it is suggested that:-

- The management model that the Estate proposes for Rowston is the same as that which is already in place at an associated site at Scar Farm in Saundersfoot. This is one where the static caravans on site are all 'owner occupied' and where sub-letting is not permitted. This tends to lend itself to occupation by a slightly older demographic of

customer, especially when coupled with the lack of any on site entertainment facility. These owners tend to visit regularly, all year round, and have sufficient disposable income both to acquire more highly specified caravans and to spend their funds in a variety of local shops and restaurants.

- This policy can also encourage caravan purchases by those who might otherwise be considering purchasing a second home in the area, thus freeing up the housing market for local people.
- It is important that Pembrokeshire recognises and reacts to the trend to staycations in the UK as travel abroad continues to be restricted and is likely to remain so in the short and medium term. It is therefore essential that local Planning Authorities work with the industry to ensure that the expectations of potential visitors are met for both short and longer term breaks. It is already understood that competition amongst holiday destinations is demanding and therefore unless the County continues to deliver high standards across the board sections of the tourist trade will look to other UK destinations.
- The proposed expansion to Rowston Holiday Park lies immediately to the east of New Hedges which is a village largely outside the National Park and with a range of services and facilities including public houses, a minimarket with Post Office, a vehicle maintenance garage and a community hall with play equipment. The improvements together with the proposed expansion of the accommodation at Rowston will help sustain the local economy – in contrast to other accommodation providers where the sites also incorporate significant shopping and entertainment facilities.
- There is a regular bus service through the village starting from Tenby and going via Narberth to Haverfordwest. This service with nearby bus stop, gives visitors access to a range of destinations including the beaches at Tenby, the shopping opportunities at Kilgetty and Narberth and to the countryside, for example, Swallowtree Woods, which is owned by the Estate, but accessible to the public..



*View within current Rowston Holiday Park showing setting for previous touring pitches. The number of older trees have recently been removed*

**Policy 41 Caravan, Camping and Chalet Development**

**New Caravan, Camping and Chalet sites and changes of pitch types within existing sites will be considered away from the coast and Preselis and in locations not intervisible 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 improvement 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:**

- a) New development (including ancillary facilities) and changes within sites avoid sensitive locations**
- b) 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 14).**
- c) There are no unacceptable adverse cumulative effects when considered in conjunction with other development in the locality (see Policy 14).**
- d) 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 42).**
- e) Enhancement opportunities achieve an overall environmental improvement whereby there are clear benefits in reducing the impact on the surrounding landscape.**

It is noted that under Policy 41 extensions to existing sites will be considered where the extension is in a well screened location.

In this instance, the proposed extension would be undertaken between the existing Rowston Holiday Park and the Lodge Farm Holiday Park to the north.

As the proposal fronts the B4316 through the village, it is the intention to implement a comprehensive planting programme prior to laying out the static caravan pitches and connecting the services of electricity, water and drainage. This approach will ensure that the screening will have started maturing before the additional proposed caravans are in place.



*View across proposed site as seen from a point near access to Lodge Farm Holiday Park*

According to the interim SPG on Caravan, Camping and Chalet Development within the National Park which has just seen completion of the associated consultation period, the Rowston Holiday Park lies close to or within the Landscape Character Area LCA1 “Saundersfoot Settled Coast” and the Related Seascape Character SCA40 “Carmarthen Bay West”. (Landscape Survey dated 2015)

*“The purpose of this guidance is to provide a systematic assessment of the capacity of existing Landscape Character Areas (LCAs) in the National Park to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It provides advice on an 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.*

*As this draft supplementary guidance is derived from the Authority’s evidence base for Policy 41 Caravan, Camping and Chalet Development through Examination it is also considered appropriate to use the guidance on an interim basis for development management purposes while the guidance is consulted upon.* (Source – Introduction to SPG).

The conclusion of the assessment is that there is *No capacity / At capacity* for additional caravans, tents or chalets in LCA1 / SCA40 as the following characteristics (of which there are 15) make the area sensitive to development. Attached as **Appendix A** is a copy of page 31 of the Consultation document on the Draft SPG listing those 15 points.

However, Table 6 on p.20 of the SPG indicates that within LCA1 there is ‘very limited’ capacity for extensions with no increase in accommodation, and that changes within sites are acceptable. The document goes on to state on p.32 that ‘There may be very limited capacity for extending some static caravan sites where the extension is less prominent (e.g. in valley bottoms or on plateaux, and/or screened by trees/hedges) and the existing sites are improved in line with the guidelines.’

There are 11 items of mitigation mentioned within the guidelines, of which this scheme achieves 10. The exception being no.3 as no ‘Glamping’ is proposed as part of this scheme.

Whilst the National Park Authority have identified the many sensitive elements supporting the proposed approach described for LCA1 and come to the recommendation that the area is at capacity, it is suggested that the particular qualities of this pre-application proposal by the Hean Castle Estate of the Rowston Holiday Park would support an exception to the broad brush approach of the proposed SPG on the grounds as previously described and as reiterated below.

The following would support the consideration of an exception to the conclusions of LCA1:-

- The opportunity for enhancement of the current Holiday Park including the significant reduction in the number of pitches within the existing Holiday Park including changing the mixture of statics / touring / tents to static only
- The concentration on static caravans only will eliminate towing vehicles and motorhomes from New Hedges and reduce disturbance within the site.

- The proposed planting programme which would both screen the site from passing pedestrians and traffic and soften the on-site environment. The details of the planting programme and of the envisaged wildlife ponds will reflect the findings of the Ecological Assessment that will be undertaken by an appointed Consultant of both the existing site and the proposed extension. A copy of this Assessment and more particularly the Recommendations, will be included with the proposed application
- The focus on improvements to the main entrance to serve both the existing and the new elements leaving the southern access point for the delivery of caravans only
- Improving the attraction of the Holiday Park together with the proposed increase in the number of static caravans will increase the spend by visitors in the New Hedges area as well as increasing the numbers employed at the site..

#### ADJOINING LOCAL PLANNING AUTHORITY (PCC)

The applicant is aware that whilst Rowston Holiday Park lies within the area of the Pembrokeshire Coast National Park, the area to the west of the B4316 which runs through New Hedges is subject to the policies contained within the LDP prepared by the County Council.

Preparation of the successor LDP2 by the County Council has been substantially progressed and with the opportunity to comment of the Deposit Draft having closed some months ago.

At present the proposed LDP2 carries little weight but after publication of potential *Focussed Changes* later this spring / early summer greater reliance will be placed on emerging policies. In respect of Tourism, it is likely that these policies will reflect a greater emphasis on the importance of holiday accommodation and visitor attractions to the economy of the County.

Attached as **Appendix B** are extracts from the recent Survey of Caravan Site Occupancy which formed part of the background information supporting the emerging LDP2 policies.

4.5 Following these results it can be suggested that the County Council, and potentially the NPA, will recognise the objective of these proposals by the Hean Castle Estate to describe a single and integrated approach at Rowston which will deliver:-

- A substantially enhanced Holiday Park
- A major landscaping scheme which will enhance local biodiversity as well as provide an amenity screen for the expansion of the Rowston Holiday Park.

**Edition 11 of Planning Policy Wales**, dated February 2021, contains the following advice in relation to Tourism:-

*“5.5.1 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. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.*

*5.5.2 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”.*

It is suggested that in this instance a balance can be struck with regard to the applicant's proposals and the local setting at New Hedges as the envisaged enhancement of the existing Rowston Holiday Park and its northward expansion should be seen as a single and integrated approach to delivering a high quality product whereby the numbers of caravans involved remains generally the same but where space and infrastructure standards are high.



**TAN 23 'Economic Development'** was published in February 2014. The following is an extract:-

### **“3.1 Strong Rural Economies**

**3.1.1** *A wide range of economic activities may be sustainably accommodated in rural areas, and this is recognised in PPW and other TANs, in particular TAN 6 Planning for Sustainable Rural Communities. Broadband and other forms of technology infrastructure are particularly important to help support rural economies. TAN 6 also defines 'rural enterprise' for the purpose of determining rural enterprise dwellings, and amongst other things includes agriculture, forestry, tourism and leisure in that definition”.*

The current proposals for the Rowston Holiday Park as described in this pre-application assessment have been estimated to cost in the region of £6.5m which gives a return on investment that is sufficiently favourable to enable the Estate to progress several other high-quality projects for which planning consent has already been agreed. Such investment will both expand the range of high quality accommodation available for visitors to Pembrokeshire and create additional jobs which themselves require a range of skills. **Appendix C** is a useful summary of the Redevelopment Project Cash Flow Forecast for years 1-15. The significant investment shows a viable scheme with quality rates of return, enhancing the tourist spending in Pembrokeshire and creating a number of associated jobs.



## 7.0 PRECEDENTS IN PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

It is considered that there have been three comparable precedents within the National Park where the Planning Authority has approved significant applications that can be seen as having some conflict with the relevant Development Plan at the time of decision.

- **NP/16/0266/FUL** (granted by Committee on 10<sup>th</sup> May 2017 under LDP1) for Kiln Park Estates Ltd where “*The development within the PCNPA boundary proposes:-*”
  - *Relocation of 117 existing caravan bases*
  - *58 additional bases for static caravans*

The Planning Officer concluded in the Officer’s Report that “*Natural Resources Wales have considered that the revisions to the numbers and siting of tourers and statics represent a betterment to the park as a whole in terms of flood risk, and combined with the comprehensive landscaping scheme proposed, it is considered that the environmental improvements are sufficient to allow this scheme to be supported subject to appropriate conditions.*” (Underling added for the purposes of this Report)

- **NP/16/0685/FUL** (granted by Committee on 10<sup>th</sup> May 2017 under LDP1) for Savills (UK) Ltd re: a site at Hasguard Cross for “*siting of 46 static caravans in lieu of 60 touring caravans pitches and retention of 20 touring caravan pitches / glamping pitches*”

The Planning Officer’s Report concluded that ...”*having regard to all material considerations it is considered that the development offers an opportunity to retain and enhance an existing caravan site through the above stated environmental improvements*”

- **NP/21/0137/FUL** (granted by Committee on 21<sup>st</sup> April 2021 under the policies of LDP2) for Bluestone Resorts Ltd where “*the following elements of the development will be located within the National Park:-*”
  - *77 no. holiday lodges wholly located within the National Park and, 3 lodges which are partially located within the National Park*
  - *Welcome Lodge*
  - *7 no. communal hub structures*
  - *Buggy parking and photo-voltaic shelter*
  - *Guest car park, and*
  - *Associated infrastructure to include circulation road, landscaping, drainage infrastructure, retaining walls and earth bunding.* (Source page 68 / 120 of 172)

The following are also extracts from the Committee Report:-

Policy 1 “*requires all development to be compatible with the twin Park Purposes of conservation and enhancement of the Park and the public understanding and enjoyment of*

*its special qualities. The duty to foster economic and social well-being of the Park communities is undertaken within the context of the twin purposes.*

*To be certain that this proposal can be justified in accordance with our secondary purpose we must be satisfied that it is compliant with the Sandford Principle, such that the enjoyment of the National Park shall be in a manner and by such means as will leave their natural beauty unimpaired for the enjoyment of this and future generations. It asserts the primacy of the first purpose over the second in cases of irreconcilable conflict. ....*

*Though generally a tranquil area, the description acknowledges that Bluestone and Oakwood reduce this locally. The development would add to the intensification of the Bluestone Development in terms of the reduction of tranquillity". (Source page 72 / 124 of 172)*

It is therefore deduced that, whilst "*Policies 38 and 40 contain a prohibition against this form of development in the countryside.....There are material considerations in favour of this development. In particular a refusal of planning permission would likely prevent the benefits of the scheme. These would primarily arise through the provision of socio-economic benefit from the development"* (Source page 87 /139 of 172)

#### Deductions and with Implications for this Proposal at New Hedges

It is considered that, whilst the NPA is fully aware of the importance of the twin Purposes, the Authority has to take the following into account before making the decision (or in the case of Bluestone) and the recommendation to Members:-

- Improvements to landscaping and / or other environmental enhancements
- The duty to foster economic and social well-being of the Park communities

It is therefore concluded that such evaluations / balance in arguments would also be appropriate at Rowston Holiday Park, New Hedges.

#### **8. 0 CONCLUSIONS**

**Re-designing the existing Rowston site to reflect the requirements to accommodate larger caravans whilst enhancing their setting, has meant that even if the area currently with consent for tourers and tents were included with the static pitches (equivalent to a total of 225 pitches), there is insufficient room within the existing boundaries to accommodate the same number of pitches for static caravans only. It is estimated by Brathertons that to achieve the proposed standards, the number of pitches would have to be reduced to 100-110 thereby making the site substantially less viable, and not worthy of the level of investment required to produce an exceptional park which the Estate wishes to create.**

**That this pre-application should be seen as a single and comprehensive proposal by the Hean Castle Estate to deliver an enhanced visitor experience in the popular Saundersfoot**

**– Tenby area by upgrading the existing holiday accommodation together with a northward expansion of the Park. The result should be an exemplar of a high quality, low density and eco-friendly caravan park development.**

Whilst the proposal increases the number of static caravan pitches at the Rowston Holiday Park by circa 38, there are a number of benefits accruing from the regeneration strategy described in the envisaged application. These enhancements include:-

- The number of pitches in Area A will be reduced by 61 (from 92 to 31)
- The number of pitches in Area B will be reduced by 61 (from 133 to 72)
- All pitches previously identified as touring pitches or for tents will only be designated as sites for static caravans. As a result no cars passing through New Hedges will be towing caravans or trailers with tents, nor will there be any mobile homes attracted to the site.
- A new and comprehensive planting regime involving both the existing site and the area of the proposed extension will be designed and implemented with the planting along the western and northern boundaries of the extension seen as the first stage in the site's redevelopment. This will allow the planting to begin to screen the site prior to any occupancy of the additional pitches taking place. The total additional planting equates to 13 acres.
- In addition to a comprehensive planting strategy it is intended to introduce three wildlife ponds which will mitigate against any perceived loss of biodiversity arising from the change in use and assist with surface drainage.
- An improved vehicular access point would serve the whole Park thereby allowing the existing access directly from the A478 to be limited to the delivery of caravans and visits to the Dwr Cymru foul water pumping station
- A number of surplus buildings within the existing Holiday Park will be demolished together with the more modern structures at Rowston Farm

The anticipated £6.5m investment over 5 years is anticipated to create or secure an additional jobs on the site together with considerable economic benefits to the local economy through all year spend by visitors. The main contractor is intended to be a Pembrokeshire based company. A Draft Project Cash flow forecast and return is attached as **Appendix C**. This delivers a viable and significant business development and in return to create spending in the tourist economy as well as create jobs to add to the already successful Hean Castle Estate portfolio.

## **9.0 DISCUSSION POINTS / PRE-APPLICATION ENQUIRY QUESTIONS TO PCNPA**

In view of recent research indicating that demand for static caravans is approaching the total consents (see **Appendix B**) and as the proposal includes:-

- A significant reduction in the density of caravan pitches at Rowston
- A substantial planting programme and other environmental improvements within the existing site and around / within the proposed extension
- A major investment of £6, 500,000 at Rowston

**Q1. Is there room for compromise in the “no further capacity” presumption under the SPG as this is an extension and enhancement with significant investment, so has clear and important material planning considerations**

**Q2. Would the NPA/NRW require a formal Visual Impact Assessment to be undertaken by a firm of Landscape Architect Consultants to accompany the proposed planning application?**

**Q3. If the “Green Wedge” is the site of substantial/quality planting, is there scope for a discrete setting of some caravans within the proposed Green Wedge? The Green Wedge does not prohibit all development.**

**Q4 Does the NPA have any suggestions regarding any improvements to the above proposals; for example the species to be planted for enhanced ecosystems?**



*View within Rowston Holiday Park showing fall towards Saundersfoot Bay and re-seeding of former touring pitches*

Whilst we will of course be pleased to supply any further information that you may request, it is suggested by Mr David Lewis, representing the Trustees of the Hean Castle Estate, that it would be particularly appreciated if we could meet with you at an agreed date and time for Mr Lewis to show you around the Scar Holiday Park at Saundersfoot (A Hean Castle Estate site) and then to progress to New Hedges and Rowston site. It is considered that explaining the business, progress and investment in person would be greatly beneficial to PCNPA.



*Zealand area of Scar Holiday Park, Saundersfoot (but higher density than proposed at Rowston)*

I look forward to an early response and meeting on site.

To support this pre-application enquiry the following documents are submitted:

- **Cover letter** (this document)
- **Completed Mandatory Pre-Application Enquiry Form**
- **Appendix A:** LCA1: Saundersfoot Settled Coast Landscape Character Area (Pg 31)
- **Appendix B:** Extracts from the recent Survey of Caravan Site Occupancy which formed part of the background information supporting the emerging LDP2 policies of PCC
- **Appendix C:** Draft Project Cash Flow Figures for the first 15 years
- **Drawing 1381/1 Rev A** Location & Existing Layout
- **Drawing 1381/6 Rev C** Proposed Development of 263 Static Caravans
- **Planning Fee** of £1,000 (exceeds 1,999 sqm)

Yours sincerely,

**MARTIN BELL BA Dip TP MRTPI (RETIRED)**  
**SENIOR PLANNER**

**ANDREW VAUGHAN-HARRIES BSC (HONS) Dip TP MRTPI**  
**DIRECTOR/PRINCIPAL PLANNER**



**RTPI**

mediation of space · making of place

# APPENDICES