

Our Ref: PA/21/0105  
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Mr Andrew Vaughan-Harris



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Dear Sir,

**PA/20/0112: Proposed upgrade/expansion of holiday park with on/off site enhancements including tree planting & ecology Rowston Holiday Park, New Hedges, Tenby, Pembrokeshire, SA70 8TL**

**Introduction**

I write further to the above pre-application enquiry. I would like to apologise for the delay in responding to the enquiry, which is due to staffing and workload issues within the planning service.

When responding to a pre-application enquiry the Authority offers the following in a response:

- The relevant planning history of the site
- The relevant development plan policies against which the development proposal will be assessed
- Relevant Supplementary Planning Guidance
- Any other material planning considerations
- An initial assessment of the proposed development, based on the information above.

**Proposed development**

The site is situated to the south-east of the Centre of New Hedges. It currently occupies an area of approximately 7.50ha of which approximately 3.80ha is used for static pitches; 2.0ha is used for tent and touring caravan pitches and the remaining 1.7ha is roadways, play area and green space within the site. The proposed area of expansion measures roughly 10.23ha – more than doubling the size of the overall site. The total site area would be 17.73ha. For the sake of comparison the area of land occupied by the village of New Hedges (inside and outside of the National Park) is approximately 11.80ha.

The site currently has planning permission for 133 static caravans, 57 unit pitches (can be used for tents or touring caravans/motorhomes) and 35 pitches solely to be used for tents. Details provided in the information



*Rydym yn croesawu cael  
gohebiaeth yn Gymraeg, a  
byddwn yn ateb gohebiaeth yn  
Gymraeg. Na fydd gohebu yn  
Gymraeg yn arwain at oedi.*

*We welcome receiving  
correspondence in Welsh, and will  
respond to any correspondence in  
Welsh. Corresponding in Welsh  
will not lead to delay.*

accompanying this enquiry advise that there are also a number of building within the site, including an office, several shower blocks, a building previously used as an amusement arcade and food outlet and a workshop/maintenance building.

The proposal is seeking to operate the site for static caravans only, with all 225 pitches being utilised for this purpose. The increased site area is proposed to permit a low density layout with scope for landscaping and ecological enhancement. It is proposed to site 29 static pitches in the area currently utilised for 92 touring/tent pitches; to reduce the number of statics within the current static site are from 133 to 70 and to shift the remaining 126 pitches to the proposed extension area. No new buildings are proposed within the site, but the existing unused amusement arcade/food outlet would be demolished.

### **Planning History**

There is no material planning history to this proposal to report.

### **Planning Policy and Guidance**

The development plan of the Pembrokeshire Coast National Park Authority is the Local Development Plan 2 (2020) (LDP2). Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website - <http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

The LDP2 should be read as a whole, however the following policies are considered particularly relevant to your proposal:

Policy 1 National Park Purposes and Duty (Strategy Policy - overarching)

Policy 7 Countryside (Tier 4) (Strategy Policy)

Policy 8 Special Qualities (Strategy Policy)

Policy 9 Light Pollution

Policy 10 Sites and Species of European Importance

Policy 11 Nationally Protected Sites and Species

Policy 14 Conservation of the Pembrokeshire Coast National Park

Policy 16 Green Wedges

Policy 29 Sustainable Design (Strategy Policy)

Policy 30 Amenity

Policy 32 Surface Water Drainage

Policy 38 Visitor Economy (Strategy Policy)

Policy 41 Caravan, Camping and Chalet Development

Policy 55 Infrastructure Requirements (Strategy Policy)

Policy 59 Sustainable Transport (Strategy Policy)

Policy 60 Impacts of Traffic

The site of development is located on the edge of the settlement of New Hedges which is identified in Policy 6 as a Rural Centre (Tier 3). New Hedges has a settlement development boundary and the extract below shows the position of this around the site of development.

### **Officer appraisal**



### *Policy and Principle of Development*

The context for considering all planning proposals in the National Park is set out in Policy 1 of LDP2 which is based on the 1995 Environment Act and the twin Purposes of all National Park Authorities. In pursuing the purposes which are to firstly conserve and enhance the natural beauty, wildlife and cultural heritage of the Park and secondly to provide opportunity for the public to understand and enjoy the special qualities of the Park. Where there is a conflict between these Purposes, then the first must prevail. In the context of the Purposes, the Authority also pays due regards to the need to foster the economic and social well-being of the local communities. Policy 7 of LDP2 sets out the strategic policy direction for the areas of the National Park outside of the defined Centres – in other words, the countryside. It allows for the tourist attractions where the need to locate in the countryside is essential. Policy 38 of the Plan sets out greater details for the Visitor Economy strategy. The main objective is to attract visitors to the National Park outside of the peak season while ensuring that the National Park environment is conserved and enhanced as landscape of national and international importance. Within this context the policy allows for limited caravan, camping and chalet developments.

Policy 41 allows for extensions to existing caravan, camping and chalet sites where the extension is well screened. Site extensions 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 the extension allows pitches to be transferred to more discreet locations. With reference to this particular proposal the Policy also requires that new development avoids sensitive locations; units are sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect; they should not cause adverse cumulative effects when considered in conjunction with other development; and enhancement opportunities must achieve an overall environmental improvement with clear benefits in reducing the impact on the surrounding landscape.

Table 7 in the text accompanying Policy 41 categorises the type and size of developments. The proposal in this enquiry would be categorised as a 'large static' site.

The Authority has adopted Supplementary Planning Guidance on Camping and Caravan development that provides a systematic assessment of the capacity of the National Park landscape to accommodate further such development. This enquiry site is situated in Landscape Character Area 1 (LCA1) – Saundersfoot Settled Coast. A summary of the capacity for this area states:

*“The area is at capacity because cumulatively the existing sites are having an adverse effect on the landscape character. The gaps between development in places, especially south west, are narrow and are needed to be retained to maintain a sense of rural character...”*

The assessment further concludes that there is no further capacity for extensions to sites and that they are already cumulatively adversely affecting the landscape character.



It is acknowledged that the proposal is intended to reduce the density of the existing static caravan site – but it also proposes to increase the overall number of static caravans and spread them throughout a wider area. The proposal would not achieve the intended policy outcome of relocating pitches from currently prominent locations to more discreet locations. Rather, it would have the opposite effect. The impact of having static caravans permanently pitched across a wider area is much greater than that of the touring caravans and tents which are not pitched year-round.

The proposed site also extends eastwards from New Hedges towards the coastal slopes. The National Park boundary is very close to the coast in this location and as a landscape designation made primarily for its coastal splendour, it is important to ensure that this narrow tract of land is not damaged by inappropriate development. When viewed from the sea, this high land forms the primarily pastoral sloping landscape forms the backcloth and is one of the characteristics identified in the SPG that makes the area sensitive to development. This whole stretch of coastline is designated as a SSSI (Waterwynch Bay to Saundersfoot Harbour).

The proposed site extension would also be immediately adjacent to an existing caravan site to the north and close to Trewayne Farm Caravan Park to the east. The cumulative impact of the site taken in conjunction with these sites would be significant – not only in landscape terms but to any remaining peace and tranquillity brought by these undeveloped areas and which assist in reducing the impacts felt by the existing developments. Light spillage from exterior and interior lighting would also be extended across this wide area.

The western-most portion of the proposed site area is within a Green Wedge defined in LDP2. It is listed in Policy 16 of the Plan as GW19. Paragraph 4.93 of the Plan details how green wedges play an important role in maintaining the landscape setting of settlements and preserving openness. The green wedges defined along the eastern side of the village of New Hedges are intended to control development in the areas close to the Centre boundary and work in conjunction with other national and local policies to control development in the open countryside. Planning Policy Wales sets out national policy guidance on green wedges. Paragraph 3.74 states that *'Inappropriate development should not be granted planning permission except in very exceptional circumstances...'* Paragraph 3.75 states that the construction of new buildings in a green wedge is inappropriate development. In this instance the creation of new static caravan pitches would constitute a structure that would be permanently located and the impact would be the same as new buildings.

It is clear from the assessment that the proposal is contrary to the locational strategy policies and the specific caravan and camping policy in the Local Development Plan and SPG. Whilst the SPG acknowledges a need to assess each case on its merits, the potential harm of this very large site extension would harm the National Park landscape and erode the special qualities in this very contained and narrow section of the Park designation, without justification in terms of reducing the impact of the caravan site on the wider landscape. This policy objection is further reflected in policies 8 and 14 of LDP2 that protect the National Park by not permitting development that would have an adverse effect on the qualities and special



landscape and seascape character.

#### *Landscape and visual impact*

The issue of the landscape and visual impact is closely linked to consideration of the principle of development as outlined in the above section. An application for this proposal will need to be supported by appropriate information to quantify the landscape and visual impact of the development. This should take the form of a Landscape and Visual Impact Assessment (LVIA). The LVIA should be produced by an appropriately qualified professional, to a recognised standard such as GLVIA 3. It should consider the landscape and visual effects of both this development itself and in combination with other similar development in the locality. As identified above there are sensitive landscape receptors in the locality including the National Park itself and its identified special qualities.

Mitigation of landscape and visual impact from the development should be fully detailed in any application and the LVIA should support the development of a full and comprehensive landscaping scheme for the proposal.

For the reasons outlined in the policy section of this letter the Authority has significant concerns regarding the landscape and visual impact of development. If an application is pursued it should be accompanied by an LVIA and full detail of landscape mitigation.

#### *Heritage impact*

The site of development is located between the settlements of Saundersfoot and Tenby, both of these settlements have designated conservation areas within their historic cores. The site is outside of the defined “important outlying areas” maps for both conservation areas. The impact on the conservation areas is considered very low.

The site is also not in close proximity to any listed buildings. The nearest listed building is Northcliffe to the south, beyond rising ground at Brynhir / Meadow Farm. Northwards the nearest listed buildings are in Saundersfoot but separated by landform. There appears no inter-visibility or sensory links. The impact on listed buildings appears very low.

The nearest scheduled ancient monument appears to be over a kilometre to the north of the site and separated by landform from the site. It does not appear to be inter-visible with the site.

During the pre-application enquiry we did request the views of Dyfed Archaeological Trust on the development. They have not responded to the consultation. The Authority has not noted any constraint in respect to archaeology from the development.

In summary, the site appears to be relatively isolated from identified heritage assets and relatively unconstrained.



### *Residential amenity*

During the site visit the application site was viewed. There are some nearby properties and it is noted that land to the north and south are within the applicant's wider estate. To the west is the settlement of New Hedges. Much of the proposed site is separated from the village by the B4316. There are some properties on the same side as the Rowston Caravan Park and where the development would be in closer proximity to residential properties, we would advise that the layout and landscaping mitigates any potential impact when the caravans are occupied.

An application should also be accompanied by information to show how amenity impacts during site construction can be appropriately mitigated. This should take the form of a draft / finalised construction environmental management plan and information on likely construction hours of operation.

Based on the site visit and application information it appears that potential impacts on residential amenity can be appropriately mitigated.

### *Highways impact*

The local highways authority has been consulted on the proposal. They have advised that they are not convinced that the current site could be capable of being developed to its full permitted capacity of caravans. They point to modern fire standards imposed through site licencing being likely to reduce the potential for the site to be occupied by caravans to the scale it is claimed to be capable of in the enquiry. They also note that an increase in use would also likely be reduced by contemporary expectations for site layouts. In their view there will be a material increase in users of the site.

In order to ensure that the site meets active travel requirements and offers alternatives to the use of the private car when using services in New Hedges, the local highways authority has suggested that a contribution should be provided to improve accessibility in the location sketched below. They indicate that this would involve improvements to approximately 120 metres of footway / footpath. The highways authority has also noted that there will be a reduction in towed vehicle movements at the site which in their view will be an improvement on the current situation. They indicate that subject to the improvements outlined they consider that the development can be accepted using the two accesses.





### *Ecological impact*

The site of development appeared to be agricultural pasture land enclosed by hedgerows with some standard trees and areas of woodland beyond these boundaries. The proposed plans show extensive planting within the site. The majority of hedgerows appear to be retained in the proposed scheme with the loss of parts of the hedgerows to facilitate access through the site layout.

Any application should be accompanied by appropriate ecological surveys and include appropriate mitigation for any biodiversity loss as well as enhancement of the sites value to biodiversity. A lighting assessment and plan will need to accompany any application and should ensure that the impact of lighting on wildlife is minimised. Appropriate lighting will also be required to ensure that the scheme minimises landscape and visual impact.

The enquiry was not accompanied by any ecological information. Generally the initial stage would be a phase 1 assessment of the site, which would identify the need for additional surveys. Appropriate surveys will need to be carried out in support of a future application with appropriate advice from an ecologist. The landscape planting and wildlife ponds indicated are welcomed as mitigation/ enhancement.

There is limited information available to provide advice on the ecological impact of development and this will need to be addressed in a future planning application.

### *Tree impact*

Based on a site visit and the aerial photographs provided there are clearly extensive hedgerows through the site and standard trees. The tree and landscape officer for the Authority has indicated that appropriate supporting information should be submitted with an application and their response is enclosed with this letter.

### *Loss of agricultural land*

The land is broadly classed as Grade 3 in terms of Agricultural Land Classification. Further assessment would be required to determine if the site occupies land within the 3a Grade. Planning Policy Wales, paragraph 3.59 requires that Grades 1, 2 and 3a are protected from development because of its special importance and should



only be developed if there is an overriding need.

#### *Flooding and drainage*

The site is not located in an area identified as being at flood risk in the current version of the Development Advice Maps associated with Technical Advice Note 15: Development and Flood Risk (2004). We are not aware of any additional potential sources of flooding at the site.

The proposal is of a scale that will require sustainable drainage system approval by the Sustainable Drainage Approval Body. The drainage scheme should be fully considered in the proposal and any engineering works required included in the application. The application should be supported by appropriate information to show the intentions for dealing with surface water drainage at the site.

The application is not supported by information on the approach to foul drainage and whether it will be by a public or private system. Full information on foul drainage should be submitted in any application. We advise to contact Dwr Cymru Welsh Water to get advice on the development in terms of foul water discharge. They can also advise on the provision of potable water to the site and any infrastructure that they may have at or near the site.

#### *Other material considerations*

During the site visit attention was drawn to an historic landfill which joins the site of development. We would advise that Pembrokeshire County Council are contacted to secure any advice that they may have on the potential for contaminated land to be an issue in relation to this proposal.

There are no rights of way through the site or likely to be impacted by development.

#### *Scheme benefits*

The Authority can consider and give weight to the benefits that accrue from a development proposal. This is supported by national planning policy within Technical Advice Note 23: Economic Development (2014) and Planning Policy Wales (2021). We have noted the cashflow details submitted with the application and the details provided as to the level of investment that will be involved in this proposal. The investment for this scheme is substantial. The Authority will consider the tests for economic development set out in TAN23 and notes that in order to give the economic benefits weight in decision making robust information should be submitted in support of any application. We advise that the information submitted at pre-application should be drawn together into a statement and submitted with an application this should address the TAN requirements and include the information that has been submitted at the pre-application stage.

#### *Conversion of building to manager's accommodation at Rowston Farm*

The pre-application enquiry refers to the above and also the construction of a new dedicated access drive to this property to the North. The access drive should form part of any future application as it is part of the wider planning application that the existing access to Rowston Farm is removed.





The application indicates that the managers accommodation would be in an outbuilding. In the site visit we visited the outbuilding and it was in relatively good condition and appeared capable of conversion. We discussed the potential for a market property to be permitted at the site which maybe possible with an appropriate contribution to affordable housing and we also discussed a dwelling to be used as managers accommodation. At present we do not have detailed plans of this proposal and it is suggested that this element of the scheme forms a separate pre-planning application enquiry.

#### *Procedural requirements*

This is a major development proposal under the Town and Country Planning (General Development Management) Procedure Order 2012. The proposal will therefore require a formal Pre-Application Consultation (PAC) stage. Full guidance on undertaking a PAC is available on the Welsh Government website. Any application will need to be accompanied by a report on the PAC undertaken.

In general, major applications are also reported to the Authority's Development Management Committee for decision.

Any application submitted will need to be screened for the need for the development to be accompanied by an Environmental Statement under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The development would fall under Schedule 2, 12 Tourism and Leisure, (e) Permanent camp sites and caravan sites. The National Park is a "sensitive area" under the Regulations. Circular advice in Welsh Office Circular 11/99 states that an Environmental Statement is more likely to be required for tourism developments in excess of 10 hectares (paragraph A33). A request can be made for a screening opinion as to the need for an environmental impact assessment prior to any submission.

#### *Legal agreement and conditions*

The enquiry supporting information indicates that the previous permissions at Rowston Caravan Park would no longer be implemented to their full extent. Permissions for the use of this caravan park represent an existing use right, these use rights would subsist following a grant of planning permission for this proposal and could potentially be implemented in future. Generally such a use right could not be removed by the planning conditions of a subsequent planning permission, the use rights would need to be removed through a unilateral undertaking under section 106 of the Town and Country Planning Act 1990 (as amended). As noted the local highways authority has also stated they will be requesting a contribution to highway improvements. They have not at present provided an indication of what the sum would be for this contribution.

Any development at the site would be subject to holiday occupancy conditions. We are aware that there are different approaches to operating static caravan sites and the application should be clear as to how the site will operate to ensure that any holiday occupancy conditions reflect the nature of the proposed site occupation..



## **Conclusion**

This is a significant extension to an existing caravan with a mix of pitches. The increased number of static pitches would increase the impact on the National Park landscape rather than achieve the wider environmental benefits required by LDP2 Policy 41. This area of the National Park is one of the most intensively developed and the cumulative impact of this proposal with the existing development in the locality would significantly erode the National Park landscape and its special qualities. The proposal is contrary to local and national planning policies to protect the National Park and its special qualities. Consideration of any economic and social benefits would need to be considered in the context of the Park Purposes. In this instance there would be a conflict between the two Purposes and the Sandford Principle would give primacy to the need to protect and enhance the National Park.

Yours faithfully



Matthew Griffiths  
Team Leader – Development Management

