



# MAJOR PLANNING STATEMENT AND JUSTIFICATION REPORT

PROPOSED UPGRADE OF ROWSTON HOLIDAY PARK, TO INCLUDE  
CONVERSION OF 92 TENTS AND TOURERS TO STATIC CARAVANS;  
EXTENSION OF SITE AREA; ON AND OFF-SITE ENHANCEMENTS;  
PROVISION OF NEW ACCESS TRACK; AND CONVERSION OF  
TRADITIONAL STONE BARN TO MANAGERS ACCOMMODATION  
WITH REMOVAL OF MODERN AGRICULTURAL SHEDS

**ROWSTON HOLIDAY PARK, NEW HEDGES, TENBY,  
PEMBROKESHIRE, SA70 8TL**

**9<sup>th</sup> February 2023**



*Aerial View of Rowston Caravan Park*



HAYS / 1398

## Major Planning Application Town and Country Planning Act 1990

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**HAYSTON DEVELOPMENTS & PLANNING LTD** is making an application on behalf of The Hean Castle Estate for the following planning permission:

- **Proposal:** Proposed upgrade of Rowston Holiday Park, to include conversion of 92 tents and tourers to static caravans; extension of site area; on and off-site enhancements; provision of new access track; and conversion of traditional stone barn to managers accommodation with removal of modern agricultural sheds.
- **Site location:** Rowston Holiday Park, New Hedges, Tenby, Pembrokeshire, SA70 8TL
- **Type of Planning Permission:** Full Major Application
- **Relevant Local Development Plan Policies:** 1, 7, 8, 9, 10, 11, 12, 14, 16, 29, 30, 32, 38, 40, 41, 55, 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**
- Existing Site Layout – Scale A0 @ 1:1250 (1381/1 Rev C)
- Existing Overall Topo (And OS Map) – Scale A0 @ 1:1200
- Final Proposed Development of 225 Static Caravans (showing proposed track to Rowston farm) – Scale A0 @ 1:1250 (1389/9 Rev B)
- Final Proposed Development of 225 Static Caravans – Scale A0 @ 1:750 (1381/0 Rev A)

- **Drawing P01**– Location Plan – Scale A3 @ 1:5000
- **Drawing P02**– Existing Site Layout Plan – Scale A3 @ 1:500
- **Drawing P03 to P05** – Existing Floor Plans and Elevations (barns) – Scale A3 @ 1:100
- **Drawing P06** – Agricultural Sheds Photo Record
- **Drawing P07** – Proposed Site Layout Plan – Scale A3 @ 1:500
- **Drawing P08 to P10** – Proposed Floor Plans and Elevations (barns) – Scale A3 @ 1:100
- **Drawing P11** – Proposed Floor Plans and Elevations (garage and bat roost) – Scale A3 @ 1:50 and 1:100
- **Appendix A** – Site Planning History Decision Notices references PR/638/2, PR/638/A, PR/638/T, NP/29/93 (D3/623/92) and planning for Site Licence Extension reference NP/132/89 (D3/1119/88)
- **Appendix B** – Pre-Application Form dated 3 August 2021 and Planning Support Statement dated 3<sup>rd</sup> May 2021
- **Appendix C** -PCNPA Pre-Application Response Letter dated 20 December 2021 (reference PA/21/0105)
- **Appendix D** – Landscape Character and Visual Impact Assessment by TDA dated February 2020
- **Appendix E** – Structural Survey of Stone Outbuildings by Stephen Rich Chartered Civil Engineer dated October 2022
- **Appendix F** – Ecological Appraisal by Kite Ecology dated January 2023 (Draft)
- **Appendix G** – Tree Survey and Assessment (to be submitted as part of formal planning application in due course)
- **Appendix H** – Bat Survey (barn conversion) by Kite Ecology dated November 2022
- **Appendix I** – Design and Access Statement
- **Planning Fee** – Change of use of land and barn conversion £460.00 x 2

1.2 This application relates to an established Holiday Park located a short distance to the east of the settlement of New Hedges. It currently consists of 225 holiday units of accommodation, with a mix of static caravans and tents and tourers, with some modest ancillary buildings and structures. To the rear, there is also Rowston Farmhouse and some associated vacant stone and other farm buildings.



1.3 This application proposal comprises several elements, but which are inter-related, and which seeks to present a single and comprehensive proposal by the Hean Castle Estate to provide an enhanced visitor experience to the Tenby/Saundersfoot/New Hedges areas of Pembrokeshire. It is contended that the proposal would represent an exemplar of a high-quality, low-density, spacious and eco-friendly caravan park development.

1.4 The proposal seeks to re-plan and upgrade the existing holiday park together with an expansion into the adjoining fields to the north, with the existing tent/tourer pitches being replaced by static caravans but maintaining the overall number of holiday units across the expanded site to 225 as approved. The application is accompanied by an extensive tree planting and robust landscaping scheme together with significant biodiversity enhancements.

1.5 It is contended that, on balance, the proposed extension of the existing Holiday Park is compatible with the two aims of the National Park taken with the need to foster the economic and social well-being of the New Hedges community. In their Pre-Application response, Officers acknowledge that each application should be assessed on its individual merits and we strongly contend that any social, economic and environmental benefits of the proposal need to be weighed against any impact upon the character and special qualities of this part of the National Park.

1.6 It is contended that the proposal would represent a sustainable form of development and that with the various extensive landscaping and biodiversity enhancements proposed, the proposal can be satisfactorily integrated into the landscape without causing harm to the character and setting of this part 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 application site has a total area of some 18 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 for the purpose of describing and justifying the proposal to inform the pre-application consultations.

1.10 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 Authority. A separate Design and Access Statement will also be provided if required by the Authority.

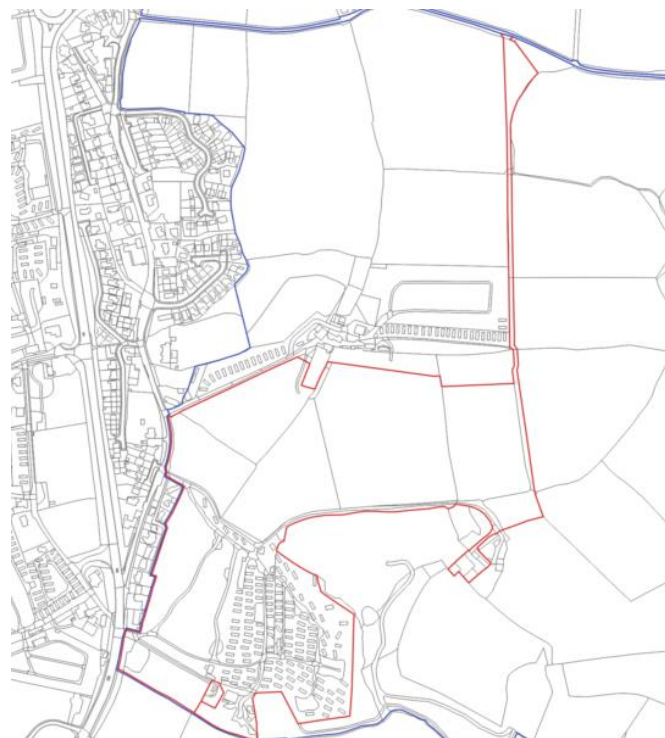
1.11 It is noted that there has already been a pre-application submission made to the Authority in May 2021 with a formal written response being issued in December 2021 (reference PA/21/0105). This formal planning application has sought to take into account the initial views and comments of Officers with the scheme having been revised and additional information and justification submitted in support of the proposed development.

## **2.0 SITE DESCRIPTION AND LOCALITY**

2.1 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 A 478.

2.2 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.

2.3 The Holiday Park occupies a large area of land with the main holiday park area located to the south with open fields to the north. There is current planning permission for 133 Static Caravans and 92 Tents and Touring Caravans (with 57-unit pitches (can be used by tents and/or touring caravans/tourers) and 35 pitches solely by tents. There is also an open area and playground located towards the western area of the main Holiday Park. The full extent of the application site for development is shown on the plan below:



***Location Plan (Site Boundaries)***

2.4 The Holiday Park has several 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 also a Welsh Water Foul Pumping Station situated adjacent to the maintenance building on the far southern boundary of the main Holiday Park. There are various informal parking areas spread throughout the Holiday Park.

2.5 There are two main vehicular access points to the Holiday Park, with one being directly off the A 478 and a further access located further to the north off the more minor B 4316 which serves New Hedges. This access route also carries on through the northern area of the main Holiday Park to Rowston Farmhouse and various old and more modern farm outbuildings located further to the east.

2.6 Just outside the entrance of the park is the centre of the village of New Hedges, which contains a small supermarket with Post Office/Shop, pub, Village Hall and several Businesses, A private footpath leads from the Park, down the valley to join the Wales Coast Path and quiet beach at Waterwynch.

2.7 To the immediate western boundary of the main Holiday Park are a row of residential properties along the B 4316 road into New Hedges. On higher ground to the north of the adjoining fields in the Lodge Farm Caravan Park and further to the east and south are the Trewayne Farm Caravan and Camping Park and the Windmills Caravan Park.

2.8 Beyond the settlement of New Hedges, the locality is generally one of undulating countryside interspersed with pockets of woodland. There is the Pembrokeshire Coast Path to the east and south-east. The existing Holiday Park is generally well screened from view due to its valley position and the surrounding topography, settlement and pockets of woodland.

### **3.0 PLANNING HISTORY**

3.1 The Holiday Park and the associated ancillary buildings are well-established. Whilst in the pre-application application response letter dated December 2021 Officers stated that there was no material planning history to the proposal, there is some planning history relating to the site.

3.2 However, we believe there is no disagreement with the PCNPA that the use of the site as a Holiday Park is lawful in planning terms. Whilst there are some discrepancies in the planning history details and sometimes a lack of plans, the current Site Licence issued by Pembrokeshire CC currently permits 133 static caravans and 92 tents/tourers.

3.3 We have reviewed the planning history relating to the Holiday Park. This is attached at **Appendix A**. In April 1965 planning permission was granted for the siting of 133 caravans (reference PR/638/2) which appears to be the first use of the site for tourism. In December 1969 planning permission was granted for the siting of 100 tents (reference PR/638/PA) and then a further permission in July 1972 for 10 caravans (reference PR/638/T) on the site, therefore up to 110 tents/tourers.

3.4 In March 1993 planning permission was granted for the use of the site for up to 92 tented camping or touring caravan pitches (with 35 for tent use only) (reference NP/29/93 (D3/623/92)). Therefore, the Site Licence would appear to be based on the 1965 and 1993 planning permissions and is taken to be the lawful use of the site, providing a total of 225 units of holiday accommodation across the Holiday Park.

#### **4.0 BACKGROUND AND BUSINESS PLAN**

4.1 The background to and ideas for the upgrading and development of Rowston Caravan Park was set out as part of the Pre-Application submission in 2021 (see **Appendix B**). This also included a Business Plan together with the likely level of investment, income generation and profit over a 10-year period.

4.2 As the overall scale and concept for the development of the Caravan Park remains largely the same in this formal planning submission, this is set out again below for completeness.

##### ***Current Position***

4.3 Rowston Holiday Park was taken back in hand by the Estate from a long-term tenant in November 2019, following the expiry of the lease by effluxion of time. 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.

4.4 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>*



*Print Screen front of Coppit Hall Beach Centre website <https://www.hean-castle-estate.com/coppethall/>*

4.5 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.

4.6 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, which had been allowed to deteriorate towards the end of the previous lease.

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

4.8 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.



4.9 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.

4.10 Several 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.

### ***Concept/Proposition***

4.11 Bratherton Park Design, who designed the highly sought after 'Zealand' area of Scar Farm for the Estate, had 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.

4.12 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 estimated 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 which would make the site less sustainable.

4.13 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 local Development Plan, Brathertons were 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 Local Planning Authority.

4.14 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.

4.15 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 local Development Plan policy can be successfully translated into high quality, low density, eco-friendly Caravan Park development.

4.16 As set out within the Pre-Application submission, it is intended to develop the whole development over a period of four to five years which would allow the proposed planting to have taken shape before full occupancy has taken place.

4.17 The proposal included several different elements which were set out as part of the Pre-application submission in August 2022. This is discussed further below together the response

of the PCNPA dated 20 December 2021 and our consideration and response to the issues and comments raised by the PCNPA in relation this submitted formal planning application.

## 5.0 PRE-APPLICATION

5.1 A pre-application scheme was submitted in August 2021 which was accompanied by relevant location and existing and proposed site layout plans and a business plan. It was also accompanied by a detailed supporting statement dated May 2021 which outlined the background to and business plan for the Caravan Park, the main planning policy considerations and identified the key issues on which the applicant sought further advice. This is provided at **Appendix B**.

5.2 This pre-application scheme involved an increase in the provision of static caravans on the site together with an expansion of this use into the adjoining fields to the north. The site would no longer be used for tourers or tents which currently occupy the western part of the existing holiday park. Several options were presented and although the indicative proposed site layout plan indicated the provision of a total of 263 static caravans, this was intended to be a starting point for discussions with the Park Authority. The initially proposed site layout plan for the development is provided below (in two parts for clarity):



Northern Section



Southern Section

5.3 Some of the key questions for the Park Authority in that Pre-Application submission were as this was a proposal for an extension and enhancement, whether there was room for compromise in the 'no further capacity' presumption under the Council's relevant SPG; whether there was scope for the discreet location of some static caravans within the 'Green Wedge' policy designation area, as it was viewed that this designation does preclude development; whether there was a need for an independent landscape visual impact assessment (LVIA) to accompanying any future planning application; and whether there were any suggestions for improvements such as through landscaping details.

5.4 We have noted the Park Authority's response in their letter of 20 December 2021. This is attached at **Appendix C**. The overall conclusion of the Park Authority was that they could not support the proposal, explaining that the significant extension of the caravan park and its visual impact was likely to be harmful and contrary to the local Development Plan. They stated the following:

**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.

5.5 Whilst we found the response disappointing, revisions have since been made to the proposals and additional information and justification have now been submitted in support of the development. We wish to respond to some specific points as follows:

***Proposed Development***

5.6 Whilst we do not disagree with the various areas of land to be used for the development, the number of static caravans proposed would appear to be at variance with that indicated on the submitted initial site layout plan. This plan indicated the proposed number of static to be 31, 72 and 160 within Areas 1, 2 and 3 respectively, giving a total of 263 static caravans. The Park Authority state a total of 225 static caravans which are now proposed in this much revised formal planning application.

5.7 Therefore, the proposed site layout plan showed a much greater scale and density of development and therefore its visual impact would have appeared much greater than that envisaged by the applicant.

***Policy and Principle of Development***

5.8 Officers state the main policy 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. However, Policies 7 and 41 do allow for the extension of existing caravan, camping and chalet sites, subject to various environmental considerations.

5.9 Officers make reference to the adopted Camping and Caravan Development SPG which indicates that for the area, the assessment concludes that there is no further capacity for extensions to sites and that they already cumulatively adversely affecting the landscape character. Whilst they note that the proposal is intended to reduce the density of the existing static caravan site, concern was expressed over the impact of having static caravans permanently pitched across a wider area would be much greater than the existing situation. As such, the proposal was unlikely to be in accordance with policy. We disagree with this assessment.

5.10 Officers express concern that the proposed site would extend eastward from New Hedges towards the coastal slopes and that these tracts of land are not damaged by inappropriate development. It will be contended that the development of this additional area of land would not be unacceptably damaging to this part of the landscape. This view is substantiated by the more recently commissioned LVIA.

5.11 Officers go on to express concern over the cumulative impact of development, when seen within the context of other nearby caravan developments. It will be contended that the cumulative impact of the development, particularly having regard to the specific details of the development and site circumstances, the impact will be acceptable. This view is substantiated by the more recently commissioned LVIA.

5.12 Officers noted that the western-most portion of the proposed site area was within the 'Green Wedge' policy designation which are intended to control development and play an important role in preserving openness and maintaining landscape setting. In response to this concern, the scheme has been revised to remove the proposed static caravans from this area, now being left as open space to be more compliant with this policy.

5.13 We do not agree with the view by Officers that such a proposal would necessarily be contrary to the locational strategy policies in the local Development Plan and whilst it is acknowledged that the proposal would involve a significant expansion of the existing site area, we again present arguments as to why such a proposal can be acceptable. There are significant social, economic and environmental benefits and that when assessed on its merits, any potential landscape impacts can be adequately addressed and mitigated.

#### ***Landscape and Visual Impact***

5.14 Officers advised that any formal planning application should be accompanied by an appropriate LVIA which considers the relevant landscape and visual effects of the development, and that this should support the development of a full and comprehensive landscaping scheme. Such a document has been submitted with this application.

5.15 In our view, the LVIA is considered to address the concerns of Officers over the potential landscape and visual impact of the proposed development but also emphasising that the

scheme has been revised and significantly reduced in scale since the Pre-Application scheme. The accompanying robust landscaping plan and woodland planting would not only integrate the proposed development into the landscape but would provide additional screening of the development from certain potential public viewpoints.

### ***Heritage Impact***

5.16 Whilst Officers noted possible heritage interests in the locality, it was concluded that the site appears relatively isolated from such assets and is relatively unconstrained. In view of this position, we do not consider that a heritage impact statement is required in this case.

### ***Residential Amenity***

5.17 Based on a site visit, and whilst noting there were some dwellings in proximity to the western boundary of the site, Officers concluded that it appears that potential impacts on amenity can be appropriately mitigated.

5.18 However, it was advised that at least a draft construction environmental management plan, including likely construction hours of operation, be submitted with any formal planning application.

### ***Highways Impact***

5.19 The County Highway Authority has been consulted and have advised that they are not convinced the current site could be capable of being developed to its full permitted capacity of caravans. They make specific reference to modern fire standards imposed through licencing and that its use is likely to be reduced by contemporary expectations of site layouts.

5.20 We find the above difficult to understand. The existing site is already appropriately licenced, and that the proposal actually reduces the density of the development throughout the extended site layout. One of the aims of the proposal is to achieve a much improved and spacious site layout to meet the demands of visitors. This would be subject to a separate licencing process.

5.21 In order to ensure that the site meets active travel requirements and offers alternatives to the use of the private car, the County Highway Authority has suggested that a financial contribution be made towards footway/footpath improvements on land on the opposite side of the B 4316 close to the northern vehicular entrance to the site. The applicant has no objection, in principle, to such a suggestion but would welcome an indication as to the level of financial contribution.



***Section of pavement subject of plans for improvement***

5.22 The County Highway Authority note that such a proposal is likely to lead to a welcome reduction in towed vehicle movements to and from the site and indicate that subject to the improvements outlined, the development is likely to be acceptable in highway safety terms and in the use of the two existing access points.

5.23 Officers confirmed that there were no rights of way through the site or likely to be impacted by the development.

#### ***Loss of Agricultural Land***

5.24 We note the policy position in respect of the protection of higher quality agricultural land and that a further detailed survey may be required to establish more precisely the land classification. However, the current use of the fields to be developed is for grazing and hay/silage cutting. The adjacent fields not for development are in the same use.

#### ***Flooding and Drainage***

5.25 Officers advise that the site is not in an area identified as being at flood risk and are not aware of any potential sources of flooding at the site. However, they advise that appropriate details be provided in respect of foul water and surface water drainage arrangements as part of any formal planning application. In terms of the main development site for the caravan park, it is intended that foul wastewater would be directed to the existing Welsh Water sewer connection with surface water to soakaways. Whilst we do not believe there to be any infrastructure capacity issues, we would welcome the comments of the relevant utility companies on the proposed development during the PAC process.

#### ***Landfill/Potentially Contaminated Land***

5.26 These comments are noted, and it is hoped that the appropriate department within the PCC will be consulted with feedback during the PAC process. However, we understand that the presence of a former landfill site nearby should not be an issue due to its age and that this does not affect the land that are to be developed.

#### ***Ecological and Tree Impacts***

5.27 Officers note that very little, if any, ecological or tree information had been submitted and that given the nature of the site and the proposed development, it was advised that appropriate ecology and tree survey and mitigation/biodiversity information be submitted with any formal planning application. Additional information has now been submitted.

#### ***Scheme Benefits***

5.29 Officers acknowledge that appropriate weight can be given to benefits which may accrue from the development. Officers note that the level of investment in this proposal is substantial and advise that the cash-flow information be formed into a more formal statement in accordance with the requirements of TAN 23. This is addressed later in this statement.

#### ***Barn Conversion to Manager's Dwelling/Access Track***

5.30 These elements have now been included as part of this formal planning application. Officers noted at the site visit that the stone barn building was in relatively good condition and was capable of conversion. An appropriate structural survey of the stone outbuildings is

submitted with this application. Options as a market dwelling or site manager's dwelling were also discussed but no preferred option indicated, but the applicant offered to make an appropriate payment per sq.ft which was deemed acceptable.

***Procedural Requirements, Legal Amendments and Conditions***

5.31 These are noted and will be complied with.

- We note that an Environmental Statement is more likely to be required for tourism developments in excess of 10 ha (paragraph A 33) (the development site has an area of some 18 ha in total. However, apart from being located within a National Park, the site is not directly affected by any other specific landscape or nature conservation designations, and it will be argued that its impact would not be that significant in visual terms. Further, any formal planning application will be accompanied by appropriate supporting environmental information. The proposal is not considered to represent EIA development. It is noted that a request for an EIA Screening Opinion can be requested prior to formal submission as indicated.
- Whilst we note the comment about existing use rights, the current proposal would partly replace one specific type of holiday use on part of the site together with an extension into adjoining fields.
- The application sets out how the caravan park is intended to be operated, such that any conditions can be appropriately imposed. The proposed operation of the caravan park has been clarified in the following section of this Statement.

5.32 The applicant has explained that the holiday park is to be all 'Owner Occupied' Caravan Holiday Homes. They do not operate any weekly letting, and do not permit the caravan owners to sublet. The park is to be open (subject to license from PCC) for 10 months of the year, closing from the first weekend in January and reopening in March. As there is no form of entertainment or catering on site, the typical demographic is professional and retired with few families. This means there would be no typical 'changeover day' and traffic movements would be fairly consistent at all times, even during the holiday periods.

***Overall Review***

5.33 Whilst the overall concept and approach towards the development of the site remains largely the same, there have been some changes to the layout and details of the development. Some of these have been partly in response to the feedback of Officers in their Pre-Application response letter dated 20 December 2021. These are summarised below:

- The initial proposed site layout plan showed the provision of a total of 263 static caravans across the expanded site. This has been reduced to a total of 225 static caravans, with the most significant change and reduction taking place within the new fields to the north of the existing caravan site.
- The number of static caravans in Area A would increase from 31 to 32 (with a toilet block being replaced by a further static caravan); in Area B this would be reduced from 72 to 65; and that within the new fields to the north this would be significantly reduced from 160 to 128.

- In relation to the existing caravan site, the existing road system is to be substantially re-routed and completely rebuilt. This would result in changes to the parking arrangements and the precise position of the static caravans.
- The application clarifies the intended use of the two main vehicular access points and to the use of certain parts of the site, such as the open space and play area to the west.
- In relation to the northern expanded part of the site, a section of the development proposed for static caravans which fell within part of the 'Green Wedge' policy designation has now been omitted and left as left as an area of open space as wildflower meadow and dog walking area.
- It is now proposed to retain all the defined hedgerow boundaries between the fields so that this part of the development is clearly contained within different field compartments. This should represent a significant landscaping and biodiversity improvement over the initial scheme.
- As a result of the two changes highlighted above, the road layout and car parking arrangements have been radically altered, this has achieved far less dense scheme with a much greater part of the site now given over to open space and landscaping. The amount of car parking required would also therefore be correspondingly reduced with much of car parking now provided in small groups.
- It was initially proposed that part of the existing Lodge Farm Caravan Park to the north be incorporated into the development, noting that 12 touring pitches would be removed from the northern edge of the site development area. This is no longer included within this formal planning application.
- It is still proposed to subsume the existing access track through the site which serves Rowston Farmhouse into the development, with a new access track being provided from the north. Further details are provided of this new access track.
- The Pre-Application Scheme included reference to the provision of three wildlife ponds, but these have since been deleted for safety purposes. These will now be landscaped sumps which will flood under storm conditions as required by SuDS.
- It was previously indicated that a separate planning application was to be submitted in respect of the proposed barn conversion. However, the details of this part of the proposals have now been fully drawn up and where it is confirmed that this would provide a manager's dwelling to serve the upgraded caravan park. This now forms part of this major application.

5.33 Therefore, it is considered that we have positively responded to the various concerns and suggestions made by the Park Authority to the initial development scheme. More importantly, it should be highlighted that the overall scale, spread and density of the proposal has been significantly reduced, including the retention of the Green Wedge policy designation as undeveloped land.

## **6.0 PROPOSAL**

6.1 This major full application involves a significant upgrading of the existing Holiday Park, with the existing tent and touring pitches being exchanged for further static caravans but with the overall number of units remaining at 225. It is proposed that the existing site be re-planned



with a lower density being provided within the existing holiday park and the remaining static caravans being relocated to within the fields further to the north. Several on/off site enhancements are also proposed, including an extensive landscaping and tree planting programme.



*View of Existing Caravan Park*

6.2 The other two main elements of the proposal involve building works associated with the agricultural buildings at Rowston Farmhouse and with the existing access track which ran through the main Holiday Park to the Farmhouse being removed, it is proposed to create a new vehicular access and track from Trevayne Lane to the north. The three main elements of the proposal are described in turn below.

### ***Main Holiday Park***

6.3 The first part of the application involves the rearrangement and upgrading of the main Holiday Park complex, which involves an expansion into the adjacent fields to the north. The general background to the proposal and reasons for the proposed development have been set out above and previously as part of the Pre-Application submission in 2021. The following is a photograph of the fields to be developed to the north and the proposed Green Wedge.:



*Fields to be retained as Green Wedge*

6.4 The current position on site, such as in terms of its layout, ancillary buildings and facilities, and the location of the areas generally used for the static caravans, tourers and tents and open space/play area has also been set out above.

6.5 The overall aim of the proposal is to replace the existing number of tourer/tent pitches (totalling 92 units) with further static caravans but maintaining the overall number of units across the holiday Park to 225 units of holiday accommodation. The static caravans would be of a standard size and a colour palette for the proposed caravans was also suggested as part of the pre-application submission as a way of mitigating the impact of the development within the landscaped Caravan Park, and more broadly within the National Park.

6.6 The site can logically be subdivided into several compartments. The proposed site layout is provided below, and is shown in two sections for clarity:



Northern Section



Southern Section

6.7 In terms of the holiday units, the number of units within the existing developed area would be reduced from 225 units (133 statics, 92 tourers) to 97 statics with the balance of the 128 statics being relocated to within the fields further to the north. The proposed numbers and density within the three areas is summarised in the following table:

Area	Description	Existing	Proposed	Area	Ha.	No. per Ha
AREA A	Statics in place of tents/tourers	92	32	21386 M <sup>2</sup>	2.14 Ha.	15
AREA B	Statics on Ex Rowston	133	65	32116 M <sup>2</sup>	3.21 Ha.	20
AREA C	Statics on New Land	0	128	78947 M <sup>2</sup>	7.89 Ha.	16
<b>Total</b>		<b>225</b>	<b>225</b>			

6.8 The existing density in existing Area A would be reduced from 43 units/ha to 15 units/ha and that within existing Area B from 41 units/ha to 20 units/ha.

6.9 In relation to the rearrangement of the existing Holiday Park area, it is proposed to retain as much of the more significant existing hedgerows and trees as possible, and to make use of some of the existing access routes and informal parking areas. For example, it is proposed to make use of the two existing main vehicular access points from the public highway and to maintain vehicular access through to the pumping station.

6.10 In relation to the expansion to the north, again, it is proposed to incorporate existing field boundaries into the proposed layout which effectively break this part of the development into three distinct parcels. The only exception is where it is necessary to breach the hedgerows to provide vehicular access through the development, but these have been minimised. The retained and proposed landscaping would help assimilate the proposed development within the landscape together with breaking-up the views between the different areas of the site used by caravans.

6.11 Roadways are provided throughout the site, with small areas of parking spread throughout to serve specific pockets of development. Parking is provided on the general basis of 1.25 spaces per static caravan, together with the odd visitor space. It is anticipated that all parking spaces would have provision for EV charging points, the electric infrastructure on the park to have capacity for increased electric use in the future.

6.12 Small drainage basins are provided throughout the development together with additional small-scale tree planting and landscaping.

6.13 The application proposal includes a significant amount of strategic tree planting around the boundaries of the site. This includes areas along the north-western and northern boundaries and an area to the south-east close to Rowston Farmhouse. This planting has the twin purpose of providing additional screening to the development in the medium and longer term and to significantly increase the biodiversity value of the site.

6.14 The area of land located towards the western area of the Holiday Park would be retained as an open space and the existing play zone has already been improved. There would also be some additional tree planting within this area in addition to the existing hedgerows and

trees which already exist in this area and which also defines the eastern boundary of this open space to the expanded static caravan area. There would be informal pathways throughout this area. However, the far north-western areas of this field would be extensively planted with woodland to provide screening in the gap of development along this side of the B 4319 and the access road to Lodge Farm Caravan Park.

6.15 As area of the fields to the north-west is proposed to be retained as open space and laid out as wildflower meadow with mown paths throughout, and which could be used by dog walkers from the Holiday Park.

6.16 The area of land located towards the south-western area of the Holiday Park previously on that part of the site used by tourers would be surfaced in reinforced grass and used for the delivery of caravans. An informal car parking area at the southern-most entrance would be planted with trees as part of a much wider and extensive landscaping scheme for the whole site, to provide additional screening of the site from the main road.

6.17 In relation to the various outbuilding/facilities largely located around the central part of the Holiday Park, the existing check-in/reception building would be retained, with the addition of a fast car charging point in the adjacent small car parking area. An existing stone clad toilet block would be converted into a launderette. An existing toilet block located towards the southern part of the site would be demolished and replaced with one of the static caravans.

6.18 The main vehicular access to the Holiday Park would continue to be from the access off the B 4316 located further to the north. Improvements are proposed to be made to this access, which, at this stage, are indicated to involve widening the existing entrance to double width carriageway by repositioning existing hedgerow and entrance feature (milkstand etc). This will allow improved traffic flow at busier times and will also improve matters for residents of Rowston Drive.

6.19 The existing vehicular access off the A 478 would be retained and be used for caravan deliveries and other HGV deliveries, such as waste and recycling lorries, and gas deliveries, and to the foul water pump station located towards the southern boundary of the main site.

### **Rowston Farmhouse**

6.20 The Farmhouse and the associated former farm outbuildings are located some 250 metres to the east of the main Holiday Park. This comprises a small group of buildings which include the Farmhouse, some



**Location Plan – Barn Conversion**

garage/store buildings to the front, a stone barn to the side and some agricultural sheds to the rear. There is a concrete yard between the subject buildings, a gabion retaining wall to the north-east boundary and a close boarded fence above a block retaining wall to the south-east. They are contained with a site area of 0.15 ha.

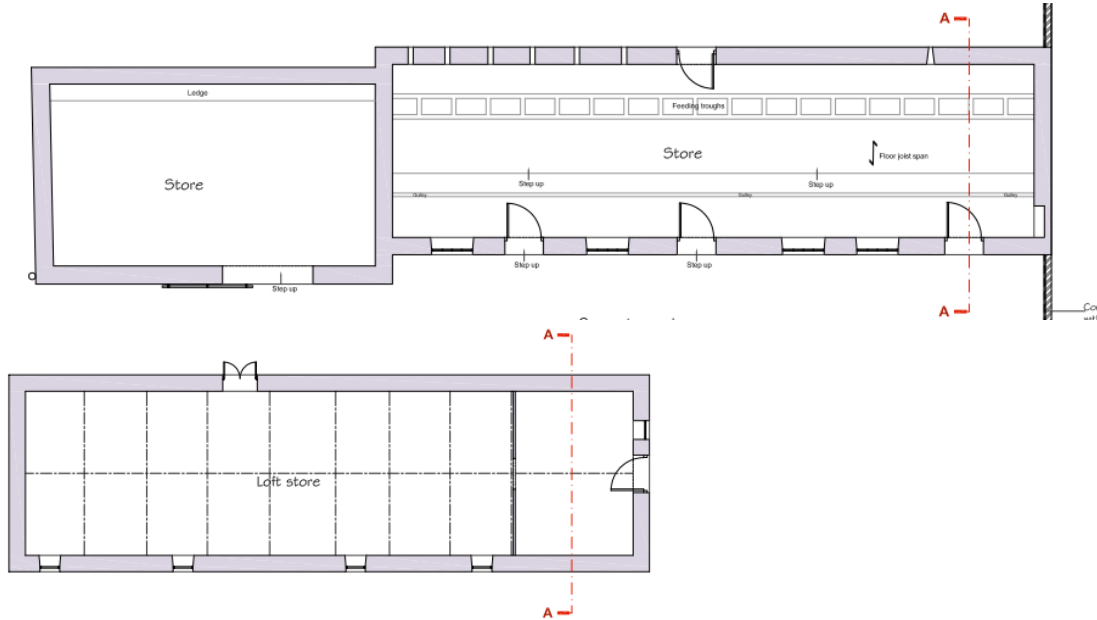


6.21 The application involves the conversion of the stone barn building, together with the rebuilding of a lower mono-roof section on its north-western side, the erection of a detached garage building together with the demolition of the agricultural sheds to the rear. The proposal does not affect the main Farmhouse or the garage/storage outbuildings to the front. The proposal is to provide a Site Manager's dwelling to serve the Holiday Park. The applicant has indicated that the existing managers chalet building located within the main part of the caravan park would be removed.

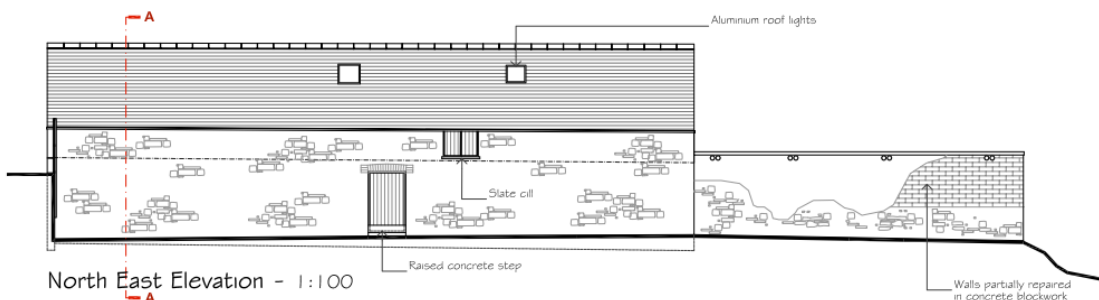
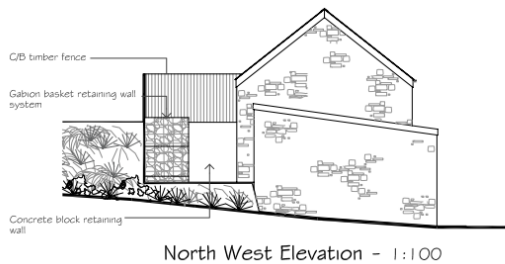


**Existing Stone Outbuildings for Conversion**

6.22 The existing barn building is rectangular in shape and has a total floor area of 225 sqm with stone elevations under a slate roof, with most of the openings on its south-western elevation facing into the farmyard. The local topography is such that with the fall away from south-east to north-west, the barn building appears single storey only from the south-east. It is generally open plan with access to a loft area from the land to the south-east.



Existing Floor Plans

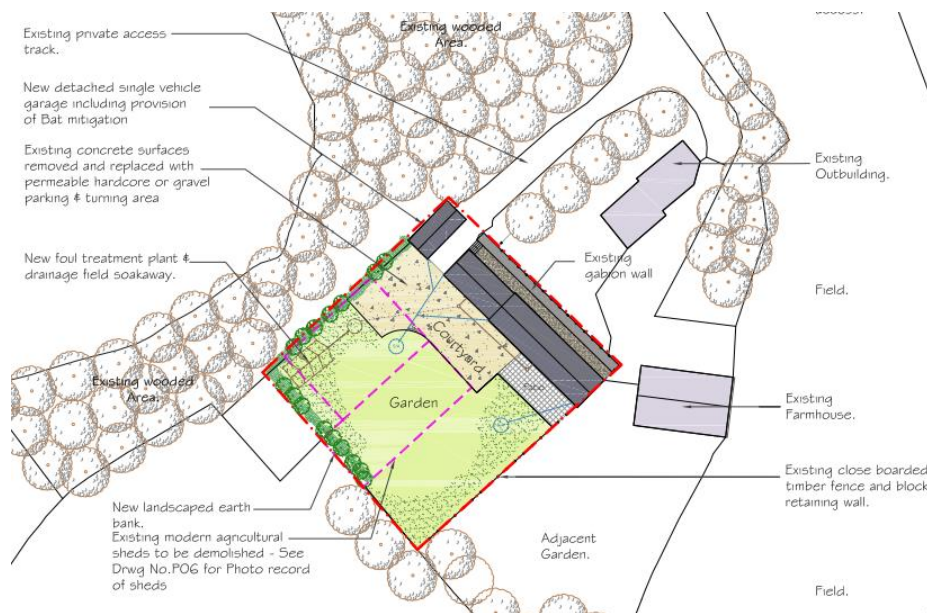


Existing Elevations

6.23 The proposed site layout plan shows that use would be made of the existing access track from the north-east with access into the site being retained between the converted barn and proposed new detached garage/bat roost building. All of the existing modern agricultural buildings located to the south-west would be demolished with the existing concrete hard standing being replaced with a permeable hardcore or gravel courtyard and small paved patio to the immediate rear of the dwelling with the rest given over to a lawned garden area.

6.24 In terms of landscaping, there would be the provision of new earth banks to both the south-western and north-western boundaries.

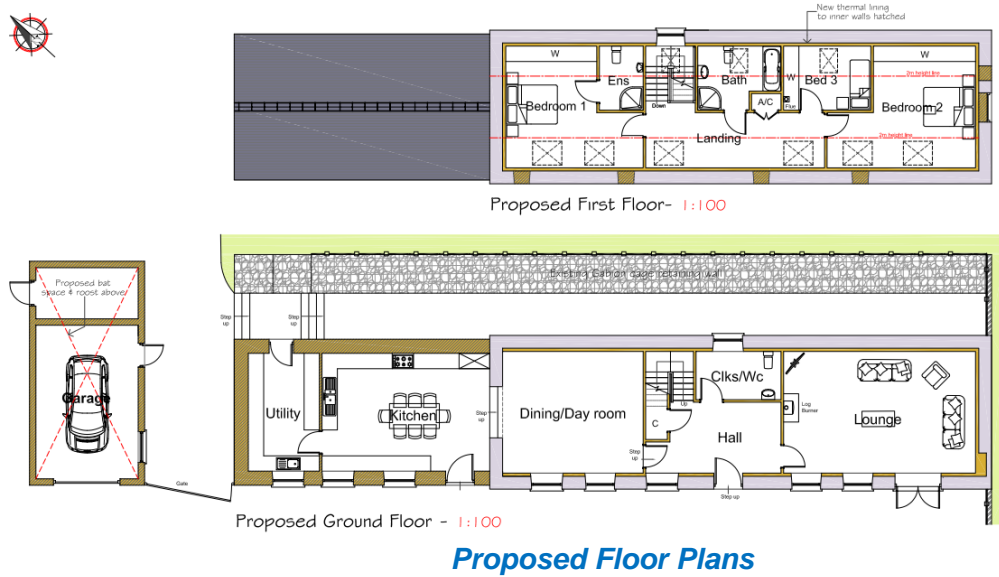
6.25 There would be a new private foul water treatment plant with drainage field located to the rear of the garaging/parking area with surface water to soakaways.



**Proposed Site Layout Plan**

6.26 The proposed conversion would provide a 3b/5p dwelling with the living accommodation on the ground floor with the bedroom accommodation within the first-floor roof area which would have restricted headroom. The replacement of the side extension would provide a kitchen and utility room area. The rebuilding of the side addition would reduce the floor area of this part of the conversion by 5 sqm.

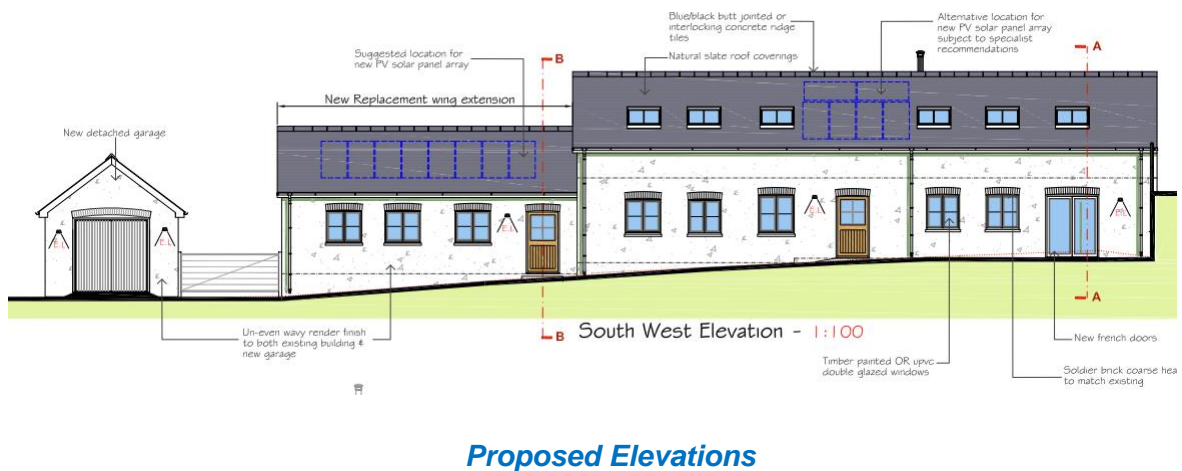
6.27 The proposed detached garage building would be single storey in form and would have a floor area of 33 sqm. The single garage space would be accessed from the internal parking courtyard area. In order to comply with the recommendations of the Ecology (Bat) Report, part of the building would incorporate a bat space and roof area in mitigation for the impact on bats within the converted stone building.



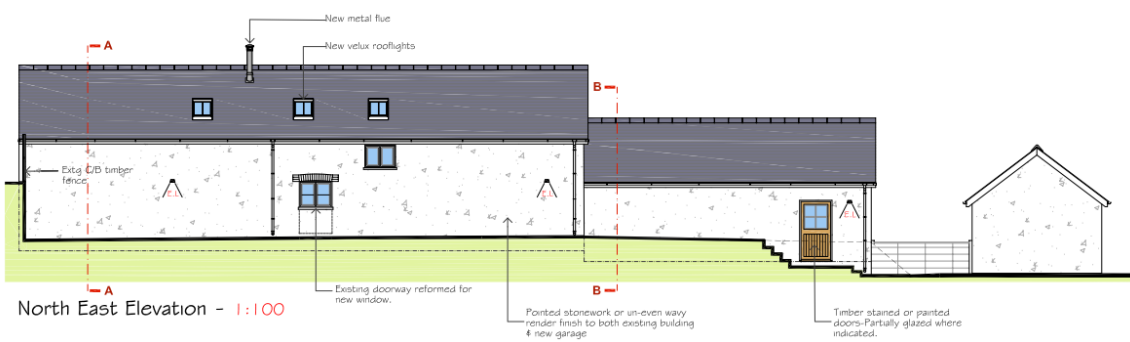
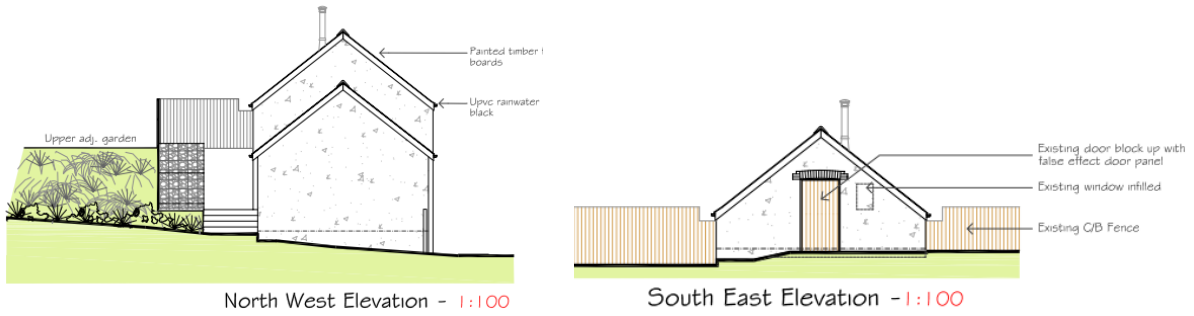
6.28 In terms of the elevations, use would largely be made of existing doorway and window openings, with some openings being altered or closed or boarded up. Several high-level openings on the south-western elevation would be blocked up with a total of 6 small rooflights installed to provide light/outlook to the first-floor bedroom accommodation. Three new small rooflights would replace two existing rooflights on the north-east elevation.

6.29 The proposed replacement side wing extension would be built with a pitched roof and in materials and appearance to match that of the main converted stone building.

6.30 The elevations of conversion scheme would comprise uneven wavy render finish to the walls with natural slate roof coverings. The doors and windows would be in painted timber or uPVC double glazed units, with soldier brick courses above. There would be a central positioned flue outlet through the roof. Low level downward external lighting is proposed to the elevations.

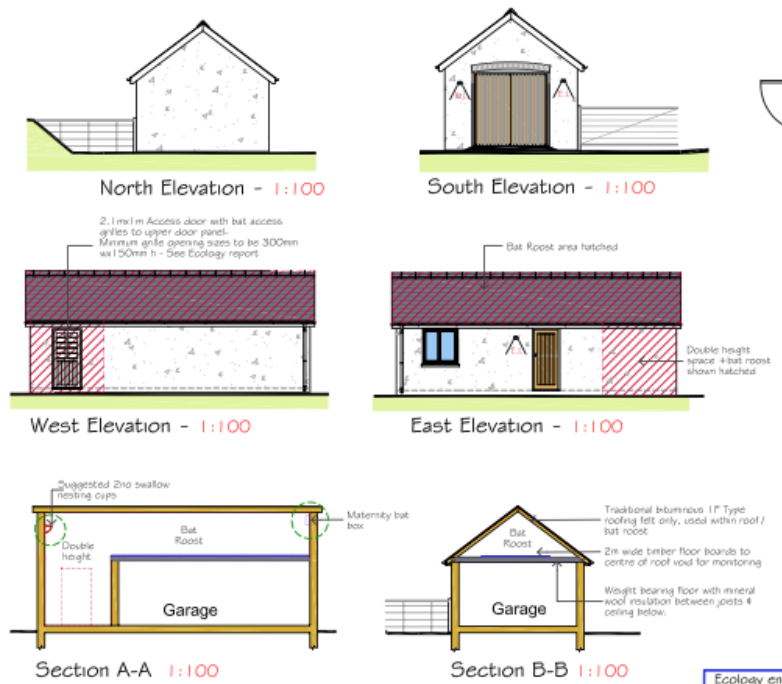






**Proposed Elevations**

6.31 The proposed detached garage building would incorporate a bat space located at the north-eastern end, which would be double height with the roof area comprising a bat roost with a maternity bat roost at one end. Other ecological enhancements include two nesting swallow cups located at the opposite end. The side entrance door would be specially designed to allow bat access to and from the adjacent woodland. The location and design details are shown on the following drawings:



**Ecological Enhancements Incorporated into Garage/Bat Roost Building**

6.32 The submission includes two possible suggested locations for a PV solar panel array. Both options position the solar arrays on south-western roof elevations of either the main converted stone barn building or side wing extension.

6.33 As part of the application, it is proposed to remove some modern agricultural sheds which are no longer in use. These are located towards the south-western corner of the site and along with the re-planning of the site, would represent both a reduction in built development but also a welcome visual improvement.



*Modern Agricultural Buildings*

#### ***New Access Track from Trevayne Lane***

6.33 As part of the rearrangement and upgrading of the main Holiday Park area, the existing access track which passes through the site to Rowston Farmhouse is to be subsumed into the development. Therefore, it is proposed that a new access track route be created off Trevayne Lane to the north.

6.34 This would serve the Farmhouse and the proposed new manager's dwelling adjacent, together with access to the adjacent fields. The new manager's dwelling would also have appropriate access to the main Holiday Park complex.

6.35 Whilst a new point of vehicular access would be formed off Trevayne Lane, the track would make use of existing gates and hedgerow gaps along its route, apart from the part removal of a hedgerow onto the lane at its northern end. An existing field gate access opposite Clicketts Heath House would be blocked up. The proposed new access track would have an overall length of some 700 metres and would be of single vehicle width with passing places. It would follow the western side of fields with the lower end passing the eastern extent of the expanded Holiday Park area. It is likely to be surfaced in permeable materials and of a type reflecting its semi-rural location, the final details of which could be conditioned.



**Proposed New Access Track**

6.36 It is proposed to include some additional native hedgerow and tree planting along much of its length, together with a small triangular area of additional woodland planting close to the main entrance. This would not only assist in assimilating this part of the proposed development into the landscape but provide additional dormouse mitigation and enhancement.

## 7.0 PLANNING POLICY BACKGROUND

7.1 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.

7.2 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 16 – Green Wedges
- 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

7.3 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 and conclusions. The SPG and earlier capacity study therefore form the primary tool for assessing the proposal in the context of Policy 41 (see below).

7.4 The application site is located within the countryside outside of any defined settlement area. Provided below is a copy of the Proposals Map extract which shows the location of the site in relation to the settlement boundary of New Hedges (red line), the National Park boundary (which extends up to the eastern side of the A. 478), and the extent of the Green Wedges policy designation (green line with mottled hatching). This shows that the application site includes a section of the green Wedge policy designation, but as has been highlighted earlier in this Statement, it now proposed that this area of the site remain undeveloped rather than accommodating some of the proposed static caravans.



**LDP Inset Map C27 – New Hedges**

## 8.0 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.**

8.1 It is considered that, on balance, the proposed extension of the existing Holiday Park is compatible with the two aims of the National Park taken with the need to foster the economic and social well-being of the New Hedges community. In their Pre-Application response, Officers acknowledge that each application should be assessed on its individual merits and we strongly contend that any social, economic and environmental benefits of the proposal need to be weighed against any impact upon the character and special qualities of this part of the National Park.

8.2 This would be achieved by the following:

- Enhancing the experience of those visitors staying at the Holiday by Park reducing the density of caravans within existing areas of the site, by improving the road layout and the removal of some buildings/structures which are no longer fit or required for their original purpose.
- Undertaking a comprehensive programme of planting both within the current area of the Holiday 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 pastureland.
- Providing and securing additional local jobs (estimated at 6fte) through improved management and operation of the existing Holiday 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.
- The proposal would maintain the number of permitted 'holiday units' on the site, including the replacement of tents/tourers and by making use of some land to the north, seeks to significantly achieve a more spacious development more sympathetic to its

landscape setting. The overall number of holiday units on the site would not be increased.

- The change from the part use of the existing site for tents/tourers to static caravans would provide for more all-year round holiday accommodation and which would increase spending within this part of the National Park. Further, entertainment for any visitors will be off-site and will therefore benefit the local economy; particularly that of New Hedges, Saundersfoot and Tenby.
- Upgrading the quality and capacity of the electric infrastructure to provide for all vehicle parking spaces to have provision for EV charging points.
- The undergrounding of a significant length of existing overhead powerlines is a priority. This would represent a welcome visual enhancement to the landscape setting.

8.3 In their Pre-application response, the Officers had raised an objection to the principle of the development and that having regard to the degree of expansion in terms of land area, its impact would be unacceptable and that in terms of the Park's purposes, where there is conflict, primacy should be given to the conservation and enhancement of the Park.

8.4 Whilst it is acknowledged the proposal would involve a significant expansion of the existing Holiday Park into adjoining agricultural fields to the north, this needs to be seen within the context of the concept of development being put forward by the applicant. The applicant is seeking to radically upgrade the existing Holiday Park with significant investment and to create a high-quality Holiday Park setting which would make a positive contribution to the local community whilst minimising its impact on the local environment.

**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).**

8.5 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 criterion (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.

8.6 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. It will be demonstrated that the proposal would accord with the parameters set out within this document.

8.7 The proposal would not represent an entirely new tourist site within the countryside. It relates to a well-established tourist facility which currently offers a range of tourism type accommodation. In our view the proposal would represent a logical and sensitive expansion of those existing facilities, whilst maintaining the number of holiday units to the permitted 225 as set out in the relevant planning permissions.

8.8 The second major part of the application involves the conversion of some stone outbuildings into a single dwelling to be used as a manager's dwelling. It is contended that the proposal would comply with criterion (c) of the above policy in that the buildings are suitable for conversion. Whilst the lower north-western section of the buildings is to be replaced due to its poorer construction, there would be little change to the overall size and scale of the buildings on this part of the site. Whilst the policy indicates a preference for market housing, the proposal is specific to the requirements of the site and which would involve the removal of an existing managers chalet building located within the main central area of the Holiday Park.

8.9 The application is accompanied by a Structural Survey of the stone outbuildings (see **Appendix E**). In terms of the main two-storey building, the survey concludes that the condition of the structure is generally reasonable and is suitable for renovation and conversion to a dwelling. However, it recommends that the floor and roof will need strengthening. In terms of the attached 'annexe' to the north-west, whilst the survey notes this structure is in a satisfactory condition, there are areas of more recent repair and blockwork and that the roof will need to be replaced. On this basis, it was decided that the best option was to replace this section of the building.

**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.**

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

8.11 Whilst the proposal would involve an expansion into adjoining fields, there would be no harmful impact upon the remoteness and tranquillity of the area. It is contended that the concepts of remoteness and tranquillity have already been compromised by existing developments in this location. In addition to the existing Holiday Park, there are other caravan parks present in the locality and there is the settlement of New Hedges and the A. 478 nearby. The site is not remote with a significant amount of population and activity in the locality. The proposal would not increase the overall number of 'holiday units' on the site and therefore the degree of activity arising from the site is unlikely to change significantly.

8.12 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 Park. The proposal has regards to the Green Wedge policy designation which affects part of the site and therefore would avoid the coalescence of settlements.

8.13 The proposal would represent a high-quality layout and design of development appropriate to its landscape setting and which would incorporate significant landscaping,



planting and biodiversity enhancements. The overall concept is to create a lower density and more spacious and attractive development.

8.14 The application site is located away from the more sensitive undeveloped coast and the Coast Path to the east and south-east. The site is close to other development, including settlement and other nearby caravan parks. The potential impact of the proposed development on the surrounding landscape has been addressed in the submitted LVIA the conclusions of which are set out below.

8.15 As highlighted by Officers in their Pre-Application response, there is unlikely to be any material impact upon the historic environment.

8.16 The proposal has regard to the Park's green infrastructure and to the biodiversity interests of the site. An Ecological Appraisal is enclosed with this application which also sets out appropriate mitigation and biodiversity enhancements. In terms of the proposed expansion of the Holiday Park, the proposal seeks to work within the physical and natural features of the site, such as with the retention of hedgerows and trees. The conclusions of the ecological survey in respect of the main Holiday Park site and the bat survey in respect of the stone outbuildings at the Farmhouse are set out below.

#### ***Landscape Visual Impact Assessment (LVIA)***

8.17 The application proposal is accompanied by an independent and comprehensive LVIA which seeks to assess the general visual and landscape character impacts the proposed expansion of the existing caravan park would have on the surrounding landscape. This is attached at **Appendix D**. The primary question asked within the document is as follows:

***'Can the site at Rowston Holiday Park accommodate an expansion to the existing site without unacceptable impacts upon the visual amenity of its surroundings, the landscape character of its immediate setting and the special qualities of the wider Pembrokeshire Coast National Park?'***

8.18 The LVIA highlights that the site is located within the National Park but is not covered by any specific landscape designations; that the Pembrokeshire Coast Path passes the site some 700 metres to the south-east; that National Cycle Route 4 passes the site entrance off the B 4316; and that the site does not contain any trees subject to tree preservation orders.

8.19 Section 3 of the LVIA reviews the landscape characteristics of the site locality. It identifies that the site is located within the Landscape Character Area LCA1 – Saundersfoot Settled Coast which is described as follows:







***"An area of land fronting a broad bay with associated rolling lowland and settlement, between Tenby and the eastern boundary of the National Park. The strong link with the coast provides a sense of place in much of the area".***

8.20 The LVIA highlights that the landscape summaries are a broadly accurate description of the landscape which lies to the east of the site. Indeed, the site's immediate setting comprises an undulating network of agricultural fields defined by traditional boundary hedgerows, with steep wooded valleys down to the numerous coves and beaches. However, due to a combination of the natural topography of the surrounding area, existing residential development, and existing caravan parks and hedgerows the site's visual envelope and influence is generally restricted. Further, that the proposed development would be well screened from the majority of surrounding public viewpoints.

8.21 Section 4 of the LVIA sets out landscape mitigation and enhancement proposals which have been developed to sensitively integrate the development into the landscape and how biodiversity value would be significantly enhanced. An outline landscape strategy is shown on accompanying Drawing No. TDA/2693/02A which includes several different elements and a detailed planting schedule. This drawing is provided below:



**SOFT LANDSCAPE KEY**

-  EXISTING HEDGEROWS TO BE RETAINED  
(Any gaps / thin spots to be infilled with new native planting)
-  PROPOSED DEVELOPMENT AREA
-  PROPOSED NATIVE TREES  
(Refer to plant schedule for species / densities)
-  PROPOSED NATIVE WOODLAND BUFFER PLANTATIONS  
(Refer to planting module for species/densities. Planting to include rabbit guards)
-  PROPOSED WILDFLOWER MEADOW  
(Emorsgate EM1 or similar approved)
-  PROPOSED TRACK  
(Refer to architectural drawings for further details)

**PLANT SCHEDULE**

**NATIVE TREE PLANTING**

ABBRV	SPECIES	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
Ac	Acer campestre	AS SHOWN	10-12 (g)	RB	2-3L	-
Bp	Betula pendula		10-12 (g)	RB	2-3L	-
Cmo	Crataegus monogyna		10-12 (g)	RB	2-3L	-
Qro	Quercus robur		12-14 (g)	RB	2-3L	-

**NATIVE INFILL HEDGEROW PLANTING**

ABBRV	SPECIES	DENSITY	HEIGHT/GIRTH	ROOT COND	POT SIZE	TOTAL
AS KEY	Carpinus betulus	5 per Lin/m	40-60 (h)	BARE ROOT	2-3L	-
	Crataegus monogyna		40-60 (h)	BARE ROOT	2-3L	-
	Ilex aquifolium		40-60 (h)	BARE ROOT	2-3L	-
	Sambucus nigra		40-60 (h)	BARE ROOT	2-3L	-
	Ulex Europaeus		40-60 (h)	BARE ROOT	2-3L	-

HEDGEROW TO BE PLANTED IN DOUBLE STAGGERED ROWS 500mm APART

**Outline Landscape Strategy - LVIA**

8.22 The proposals include the following:

- The retention of all existing field boundary hedgerows and associated hedgerow trees.
- The infilling of any gaps / thin spots within existing hedgerows to ensure their long-term preservation, in keeping with recommendations made by the Pembrokeshire Coast National Park Landscape Character Assessment.
- A new woodland area to the western boundary of the site to improve biodiversity and ecological value, in keeping with recommendations made by the Pembrokeshire Coast National Park Landscape Character Assessment.
- A new native buffer plantation to the northern, eastern and southern boundaries to screen the development. The plantation will include understorey species and standard native trees.

8.23 Section 5 provides a detailed visual appraisal and landscape impact assessment. A total of 11 public viewpoints were taken which are shown on accompanying Drawing TDA/2693/01, and which were carefully selected to review the development's possible impacts upon visual receptors throughout the surrounding area – including short, medium and long-range views. The assessment established that the proposed development was likely to be visible from viewpoints 4, 6, 7, 8 and 11, but being only partly visible with transitional glimpses from viewpoint 7.

8.24 However, it is contended that once the landscape mitigation measures were established, including additional areas of woodland planting, visual and landscape character impacts would be largely negated. Further, it is clear from the assessment that a future development would be viewed in the context of the existing holiday parks that envelope the site. Whilst any proposed development would change the character of the site itself, the development would represent an extension to the existing holiday park and would therefore be in keeping with the wider established landscape character of the area.

8.25 The overall conclusion of the assessment was as follows:

***'It is therefore considered that the site can accommodate an expansion to the holiday park without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape.'***

### ***Ecological Appraisal***

8.26 This appraisal covers that part of the application site which relates to the expansion of the main Holiday Park to the north of the existing developed site. This is attached at **Appendix F**.

8.27 An extended Phase I and Protected Species Survey of the land to the north and north-east of the existing Holiday Park. This related to five agricultural fields which covered an area of some 9 ha, to be developed as an extension to the existing main Holiday Park. The Survey area is shown in the following aerial photograph:



*Survey Area (Source: Ecological Appraisal – January 2023)*

8.28 The Survey identified that the proposed development extension related to areas of semi-improved neutral grassland fields mostly used to graze sheep, but with several small patches of Himalayan Balsam in the far south-eastern corner of the fields (a species of special concern which it advises should be removed in accordance with guidelines). The Survey also identifies a series of 11 mixed hedgerows generally separating the fields with the only trees of note being a Sycamore within in hedgerow H2 and two Ash within hedgerows H5 and H9.

8.29 It reports that where possible grassland is to be retained and included in the scheme. An area of grassland to the north-west are to be retained to screen the development from the surrounding landscape (with reference to the LVIA) and as well as additional hedgerow planting, the grassland in these fields are to be retained and enhanced as wildflower meadow with pathways between them.

8.30 Under the proposals, it reports that all existing hedgerows are to be retained, although it will be necessary to cut additional access points around the site. a new hedgerow is to be planting along the northern boundary to provide a natural screen between the site and the surrounding land. It reports that all new planting will utilise locally sourced native species and at paragraph 4.6.2 it sets out a detailed hedgerow management plan.

8.31 At paragraphs 7.4.3 to 7.4.6 of the Appraisal it specifically addresses the impact upon hedgerows and mitigation/enhancement measures. It highlights that some 5 small sections of hedgerow would need to be removed and that the two more central hedgerows H7 and H11 are likely to lose their suitability for use by dormice. However, it highlights that this loss would be more than compensated for by significant additional planting along the northern and southern boundaries and along the new vehicular access track further to the north-east, providing additional links to the surrounding habitat.

8.32 Further, to monitor future dormouse use on site, 25 dormouse nest boxes will be installed on site. These will be installed in the new habitat along the northern boundary and the new access road to the north-east. These measures will retain the favourable conservation status of the species on the site.

8.33 The main findings in respect of protected species/wildlife was as follows:

### **Badgers**

No evidence of badgers was found on site and no badgers or their activity was found during the bat transect survey. However, it advised that a pre-development check be carried out as a precaution.

### **Bats**

The proposed development site was identified to be within 2 kms of Beech Cottage Waterwynch SSSI which is part of the Pembrokeshire bat Sites and Bosherton Lakes SAC. The presence of these roosts meant that the site falls within the 'Core Sustenance Zone' for bats. The main conclusion on bats was as follows:

*'At least 7 bat species were recorded during the survey period. However, records were relatively low during both the transect and static surveys. Common and soprano pipistrelle bats were the most commonly recorded species, with greater and lesser horseshoe bats only recorded during the static survey and limited to very occasional passes. There are no trees or building on site to support roosting bats, so no direct impacts are envisaged. Boundary habitat is to be retained and improved around the site to ensure foraging and commuting corridors are maintained. A sensitive lighting strategy will be designed which will avoid shining lighting directly onto retained the surrounding and minimises light spill onto retained habitat.'*

### **Dormice**

*'Dormice have been recorded on site. As a protected species, prior to any works which would impact on the dormouse habitat it will be necessary to obtain a dormouse development licence from Natural Resources Wales. Such licenses can only be applied for once full planning permission has been granted and all conditions relating to dormice have been discharged. As part of a Natural Resources Wales development licence, a method statement must be written which sets out how the scheme will proceed, while allowing the dormice to continue to utilise the site post development. The scheme includes large areas of new planting which will more than adequately compensate for the loss of any hedgerows, so retaining the favourable conservation status of the species on site.'*

### **Birds**

*'Any required vegetation clearance takes place outside of the breeding bird season (considered March to August inclusive) to avoid disturbance/destruction of any active nests.'*

### **Reptiles**

*‘Grass snake and slow worm have also been recorded within a 2 km radius of the site so are also likely to be found on site. The presence of common species of reptiles will be assumed on site and work completed under a working brief.’*

The suggested working brief is set out within paragraph 9.8 of the Appraisal.

**8.34 The overall conclusion is that the proposed development, with the various mitigation, compensation and enhancement measures proposed, would comply with relevant national and local planning policy in respect of the nature conservation status of the site. Indeed, it is contended that this aspect of the proposals would represent a significant net biodiversity gain in the medium and longer term.**

### **Tree Survey and Assessment**

8.35 The proposal is not considered to impact significantly on any existing trees which may be of significant amenity value. The most significant trees are located along the site boundaries or off-site rather than within the main body of the site for development. The existing Holiday Park area would simply be re-planned with the existing open areas remaining undeveloped with the expansion of the site into some open fields. There would be some minor removal of parts of internal hedgerows. In any event, a substantial tree and woodland planting programme which would more than offset any minor tree loss. It is anticipated that any formal planning application will be subsequently accompanied by an appropriate tree survey and impact assessment which will confirm that the proposal will be acceptable in tree impact terms (to be provided at **Appendix G**).

### **Bat Survey**

8.36 Part of the application proposals involve the conversion and part rebuilding of a barn building at Rowston Farmhouse together with the demolition of some more modern agricultural sheds. The application is therefore accompanied by a Bat Survey which focuses on the stone barn building which was likely to harbour bats rather than the agricultural sheds to be demolished. This is attached at **Appendix H**.

8.37 The main findings can be summarised as follows:

- Whilst the site is not within any designated conservation nature conservation sites, the report highlights that there are numerous designations within 5 kms of the survey area. These include the Beech Cottage SSSI which lies 400 metres to the south, which also forms part of the Pembrokeshire Bat Sites and Bosherton Lakes SAC. The report highlights that brown long-eared bats are a secondary feature of the SAC.
- As the barn is to be converted, in the absence of mitigation, such roosting opportunities would be lost which may lead to impact on the behaviour of individual bats, so this may have a minor impact on the above designated site.

- As the development relates to the conversion of an existing building, surrounded by other buildings, the proposal is unlikely to impact upon the other designations.
- A total of five brown long-eared bats were recorded using the barn and as they are known to form small maternity roosts, it is likely that the maternity roost found within the barn is for this species.
- The report advises that prior to any works which would impact on the bat roost it will be necessary to obtain a bat development licence from NRW.

8.38 The report sets out an appropriate Mitigation Strategy to offset the loss of the maternity bat roost and advises that the strategy must be designed which allows bats to roost on site post development as is currently the case. This would form part of a future licence application.

8.39 It is proposed that to mitigate the loss of the roost, a new dedicated bat roost is to be provided in part of a new detached garage building. This is to be located to the north-west of the barn conversion and adjacent to the nearby area of woodland. A new dedicated bat loft is to be provided in part of the new garage building, designed to allow bats to enter and fly-around the building. An internal improved modern bat maternity box is also included in the design.

8.40 As swallows have also been found to be nesting on site, the double height section of the garage building would also incorporate swallow nest cups.

8.41 The report also advises that consideration be given to any external lighting. As advised, all external lighting on the barn conversion would be appropriately designed to be downward facing and positioned away from the bat roost.

8.42 The report sets out in some detail the various requirements for the replacement bat roost and other mitigation/enhancement measures. The above recommendations, including biodiversity enhancements, including additional landscaping and planting, have been incorporated into the layout and design of the development. These enhancements are argued to be significant and to represent an appropriate and proportionate approach in this case.

### **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.**

8.43 No significant level of external lighting is anticipated from the proposed development. The proposal would involve a re-planning of the existing Holiday Park together with its expansion to the north. The proposal would represent a be relatively low density and low-profile development and would be well-screened with little impact beyond the site's

boundaries. The site would not appear prominent in the landscape (with significant additional screening planting being provided in the medium/longer term) with any lighting projection contained within the site. **An appropriate lighting plan will be submitted as part of the formal planning application.**

8.44 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. Any lighting proposed would therefore be related to its intended purpose and its impact can be mitigated.

#### **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.**

8.45 It is contended that the proposal would not have an unacceptable adverse effect upon the special qualities and landscape character of this part of the Park. A detailed assessment of the potential visual impact of the development on the landscape has largely been addressed within the earlier sections of this Statement, informed by the submitted LVIA. It is contended that the initial views of Officers in relation to the likely visual impact of the development on the surrounding landscape is overstated.

8.46 It is considered that the visual intrusion of the proposed extension of the Holiday Park, where the overall number of pitches would remain the same, would be limited. The extension lies between the existing Holiday Park and Lodge Farm Caravan Park to the north and because of the substantial planting proposed along various boundaries of the site, this would totally screen the development from public views in the medium to longer term.

8.47 Although other parts of the site would be partly taken up by the internal informal access tracks and some parking spread throughout the site, it would retain a generally open and spacious character and appearance, reflecting its immediate landscape setting.

8.48 The proposal would not introduce or intensify a use which would be incompatible with its location. The immediate context of the site is important, with the presence of settlement and



other caravan parks. Whilst the proposal would extend into the adjoining fields, the number of overall pitches would remain unchanged and as previously noted, the introduction of static caravans in place of tents and tourers is likely to result in a reduction in traffic movements perhaps balanced against the greater use of the site throughout the year.

8.49 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 is already used as a Holiday Park. The proposed extension would work with the natural slope of the site with no significant alterations required to the landform with key natural site features being retained and incorporated into the site layout and design of the development.

8.50 It is contended that the proposed new access track which is to serve the existing Farmhouse and nearby fields, this would have a limited impact upon the countryside and landscape setting. The access track would be suitably surfaced with additional hedgerow and tree planting to provide additional screening. It would not appear visually intrusive in the landscape.

8.51 It is contended that the proposed conversion of the stone outbuildings at the Farmhouse to a dwelling would have an acceptable impact. The proposal would represent a sympathetic conversion of the existing buildings and would put this vacant building to a beneficial use in association with the Holiday Park. The proposed detached garage/bat roost building would be modest in scale and with the removal of the existing more modern agricultural sheds and treatment of the land for residential purposes would represent a welcome improvement in the visual amenities of the site.

8.52 Careful consideration has been given to the detail and possible cumulative impact of the development. The proposals, when assessed in combination, are considered to have an acceptable impact upon the Park. Both the proposed new access track and stone buildings conversion are deemed to have only very limited impacts.

8.53 The main change relates to the extension of the main Holiday Park to the north. The Officers in their Pre-Application response expressed concern over the proximity of the proposed development to the Lodge Farm Caravan Park to the north and that of the Trevayne Caravan Park further to the east and its cumulative impact. It is contended the cumulative impact in this case would not be significant or to be harmful in landscape impact terms. There would be some physical and visual division between the proposed development and that of Lodge Farm to the north, with extensive tree planting provided in between, with the wider landscaping scheme providing a high degree of visual enclosure for the development.

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

## 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 B 3146



8.55 The Local Plan extract plan (see above) shows part of the Green Wedge to lie within the application site area. The Extract plan below 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 which is roughly triangular in shape.

8.56 As noted earlier in this Statement, part of the proposed development has now been taken out of this Green Wedge designation, now only extending to the east of the first hedge line. This part of the site is now to be retained as open land and free of development, with a belt of woodland planting proposed along the western and north-western boundaries with the rest of the land being used as an open space with informal walkways for residents of the caravan park. Therefore, the use and treatment of this area of land now complies with the objectives of the above policy.

8.57 **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.

8.58 It is contended that the approach described by the applicant meets the above criteria and that 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.

8.59 Since acquiring the lease in 2019 the applicants 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/removal of surplus buildings and reducing the density of caravans over the site – all of which will be static caravans.

8.60 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 Caravan 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.

8.61 In terms of biodiversity, the current design incorporates substantial planting both within the old and new elements and along the borders of the site. There would be little impact upon existing natural site features, such as trees and hedgerows, with the majority of these being retained and integrated into the layout of the proposed development.

8.62 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.

8.63 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.

8.64 The proposed static caravans would provide single level accommodation with easy and convenient access and would be suitable for all users. There would be parking spaces provided nearby with convenient access through to the main site and to open space and play areas.

8.65 **Policy 30** specifically deals with **amenity** and aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. There are some residential properties along the eastern side of the B 4136 which border the western side of the existing site and there is the Lodge Farm Caravan Park beyond the existing fields to the north. However, the proposed development would be no closer to these houses to the west with the western part of the existing site being retained as open land. Likewise, the additional development to the north would be separated by the retention of the 'Green Wedge' policy designation area as open land. The Lodge Farm Caravan Park to the north is on higher ground and again would be screened by some new planting along the site boundary.

8.66 It is proposed that the northern most vehicular access off the B 4136 would be used by visitors to the caravan park. Whilst this is likely to be have a greater use with the southern-most access being used for general servicing purposes only and with some greater impact upon the residents closest to the access, this impact is unlikely to be significant or harmful. Further, as mentioned elsewhere in this Statement, the replacement of tourers with statics would remove certain types of traffic movements from the site which is a welcome benefit.

8.67 **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 and although the internal roads are likely to be in tarmac, the parking areas are likely to be in permeable materials. Large parts of the site would remain free of development, with an open space being retained on the western-most part of the site. The proposed drainage arrangements have been set out earlier in this Statement.

8.68 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. Given the extent of the development involved, 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.**

8.69 It is contended that the opportunity to stay in the proposed additional static caravans would meet the objective of Policy 38 and when viewed in association with Policy 41, it can be seen this type of tourism accommodation development can be acceptable in countryside locations. Arguments on compliance were put forward as part of the Pre-Application submission in May 2021 and are repeated here for completeness:

- 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.

#### **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.”**

8.70 The above policy is a key consideration in the assessment of the proposal. The policy allows for extensions to existing caravan, camping and chalet sites where the extension is well screened. Table 7 in the text accompanying Policy 41 categorises the type and size of developments. This proposal is deemed to be categorised as a ‘large static’ site.

8.71 It is argued that the site is situated in a well-screened location. Whilst some parts of the site for the additional development proposed are currently visible from certain viewpoints (as identified in the submitted LVIA), which include views from the B 4316 through the village. However, 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. The development is to be phased. This approach will ensure that the screening will have started maturing before the additional proposed caravans are in place on the additional land to the north.

8.72 In our view, the site is in a location away from the more open and prominent coastline and the Preseli’s and would not be inter-visible with them. The proposal would represent a low-lying development. The site is close to the National Park boundary further to the west and which is already heavily influenced by the other existing development and urban features, such a New Hedges and the B 4316. Whilst the site is located within the National Park, given its immediate context, it is therefore questionable whether the site is in one of more sensitive areas of the National Park.

8.73 It is argued that notwithstanding the presence of other nearby caravan parks, the proposal would not have an adverse cumulative effect upon the character of the area. whilst it is acknowledged that there would be some additional impact, the phasing of the development in conjunction with a comprehensive tree planting and landscaping scheme with satisfactorily integrate the development within the landscape. It is argued that the Officers have overly stated the likely visual impact of the proposed development, including its possible impact upon this sloping landscape and in views from the sea.

8.74 Apart from the static caravans 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. An existing managers chalet building would be removed with some existing stone buildings being

sympathetically converted into a manager's dwelling. The additional garage/bat roost building would be modest in size and would be offset by the removal of other outbuildings.

8.75 The proposal delivers clear and significant environmental improvements, such as in terms of additional tree planting, landscaping and ecological enhancements. The proposed landscaping would be significant in extent particularly when seen within the context of the scale of development involved. There would be clear benefits in reducing its impact upon the landscape.

8.76 It is acknowledged that there would be some conflict with Policy 41. For example, in the sense that the existing site does not have highly prominent parts when visible from the coast, or that the proposed extension would allow pitches to be transferred to more discreet locations. It is also acknowledged that the introduction of static caravans in place of tourers and tents is likely to have a greater visual impact upon the site. However, it is argued that the proposal should be considered as a whole, taking into the account the significant benefits which would accrue from the development.

8.77 According to the SPG on Caravan, Camping and Chalet Development within the National Park, 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 a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated."*

*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).*

8.78 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. These are set out on page 31 of the document.

8.79 However, Table 6 on page 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 page 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.'*

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

8.81 Whilst the 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 proposal by the Hean Castle Estate of the Rowston Holiday Park would support an exception to the broad brush approach of the SPG on the grounds as previously described and as reiterated below.

8.82 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 application is accompanied by a comprehensive landscape planting and management plan, together with associated biodiversity enhancements. These significant benefits would not happen without the development proposal coming forward.
- 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.
- The significant financial investment proposed by the applicant together with a significant improvement to the appearance of the existing site and facilities.

8.83 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. It is argued that the proposal, when seen in the round, would comply with the overall aims and objectives of Policy 41 and the associated SPG.

8.84 **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.**

8.85 Having regards to supporting paragraph 4.325, we do not believe that due to the scale and nature of development involved that a Transport Assessment is required in this case.

8.86 It is proposed to make use of the two existing main vehicular access points which serve the existing caravan park off either the A 487 or the B. 4316. The location of these access points together with their construction arrangements and visibility are deemed to be of a suitable standard to support the scale and type of development proposed.



*Existing Vehicular Access Arrangements*

8.87 The issue of vehicular access and highway safety has already been addressed earlier in this statement, which has included an initial positive response from the County Highway Authority. The applicant has indicated that they are prepared to make an appropriate financial contribution towards a pavement improvement nearby.

8.88 It is suggested that the amount of additional traffic likely to be generated by the development 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.

8.89 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 Tenby, Saundersfoot and New Hedges.

8.90 The caravan park is located in a highly accessible location being within easy reach of several holiday destinations and attractions and with the site being close to a regular local bus route and part of the National Cycle Route, there are clear alternatives to the use of the car. It is a sustainable location for this type of development.

8.91 The application proposal also includes the creation of a new vehicular access track from the north which would serve the existing Farmhouse and new manager's dwelling (to replace an existing site manager's chalet building). The traffic movements associated with these uses are already present on site but would simply be moved onto these new access route which is unlikely to create any highway safety issues onto the adjacent country lane.

8.92 We are not aware of any traffic safety issues associated with the operation of the existing holiday complex and we do not consider that any environmental damage would be caused by the proposed development. Indeed, by exchanging touring caravan/tent pitches for static pitches would reduce the number of towed caravans and trailers with tents passing through the village and other local roads.

## **9.0 SUMMARY OF SCHEME BENEFITS**

9.1 These were set out as part of the Pre-Application submission in May 2021 and although the scheme has been revised, partly in response to the initial feedback of Officers, the benefits largely remain the same and are repeated here for completeness:

- 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.
- A reduced density and removal of regimented layout will make for a much more spacious and attractive site appropriate to its setting.
- 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 A 478 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 track 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 – Majority will be full time, year-round.
- No new buildings to be constructed. However, following the conversion of the stone barn building into a site manager's dwelling, an existing chalet building on the main site will be removed.
- The proposal seeks to make beneficial use of some stone outbuildings with suitable conversion to a dwelling together with associated visual improvements to the Rowston Farmhouse part of the wider site.
- The existing field boundaries and internal natural site features within the enlarged area will be retained, 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.
- On the back of the Ecological Appraisal, it is proposed that a detailed landscape and management plan will form part of the final application submission. The submitted LVIA already includes an extensive landscape and tree planting scheme which could feed into the overall management plan for the site.
- The likely cost of a development of these proportions is likely to be substantial. The Return on Investment (ROI) is excellent, which will enable the Estate to progress several other high-quality projects for which the applicant's already have consent, in fairly short order, creating further jobs, and expanding the range of high-quality accommodation provision in the area.
- 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 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 policy designation area, not only is this now to remain free of any development, 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 2.4 ha = 22.08 units/ha. By comparison, in terms of the current proposal at Rowston, the existing site would have densities of either 15 and 20 units/ha with the extended area to the north having a density of 16 units/ha.



*Aerial View of Scar Farm*

- Part of the application includes the retention and conversion of the existing stone outbuildings at Rowston Farmhouse. These buildings are currently unused and are worthy of retention and suitable for reuse. The application involves a sympathetic conversion of these buildings.

## **10.0 PLANNING POLICY WALES – FEBRUARY 2021**

10.1 *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.

10.2 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.*

10.3 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 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 involve the upgrading and enhancement of an existing Holiday Park 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 Holiday Park in the medium and longer term; employment during the construction period and in the building supply industry; and 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 proposed development would minimise its visual impact on the landscape character and amenities of the area. The proposal can be satisfactorily accommodated into its sensitive landscape setting. The nature conservation and biodiversity interests of the site would not only be safeguarded 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.

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

10.5 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”*.

10.6 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”*.

10.7 TAN 6 relates to the important issues relating to development in rural areas. Sections 3.2 and 3.6 relate specifically to the reuse/adaptation of rural buildings with the following paragraphs being relevant:

*‘3.2.1 When assessing planning applications for the re-use or adaptation of a rural building, the primary consideration should be whether the nature and extent of the new use proposed for the building is acceptable in planning terms. It should not normally be necessary to consider whether a building is no longer needed for its present agricultural or other purposes (although in the case of a tenanted agricultural building, the value in planning terms of the existing use should be taken into consideration).*

*3.2.3 Conversion proposals should respect the landscape and local building styles and materials. If a planning application is submitted for the re-use of a building which the planning authority considers has a significant adverse effect on the landscape in terms of visual amenity, it may be appropriate in connection with any proposed structural changes to impose conditions to secure an improvement in the external appearance of the building.’*

*3.6.1 Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use.’*

10.8 Part of the application proposal involves the conversion of a former agricultural stone barn which is no longer required for its original purpose. It is suitable for conversion as evidenced by the submitted structural survey. It is contended that the nature and extent of the proposed use is acceptable in overall planning terms and that the details of the proposal are sympathetic to the style of the building and locality and which would bring about a welcome improvement in its appearance. The works involved in the proposed conversion would not be extensive and the creation of the residential curtilage (given its current use and condition) would not have a harmful effect on the character of the countryside. Its use as site manager’s accommodation to serve the Holiday Park is considered to be an appropriate and logical use of the buildings.

10.9 TAN 23 recognises that the planning system plays an important role in supporting the delivery of sustainable rural economies and business. Paragraph 3.1.1 states the following:

*‘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.’*

10.10 Section 2.1 deals with ‘weighing economic benefit’ which advises that a central objective of the planning system is to steer development to appropriate locations, and states:

*‘2.1.1 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such ‘win-win’ outcomes, where development contributes to all dimensions of sustainability.*

*2.1.2 Where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary. There will of course be occasions when social and environmental considerations will outweigh economic benefit. The decision in each case will depend on the specific circumstances and the planning authority's priorities.'*

10.11 In this case, it is contended that the development would not cause environmental or social harm and that even if some harm is caused, this is sufficiently mitigated and is more than outweighed by the various benefits of the development (see Section 7 of this Statement above). At paragraph 2.1.5 it advises that three questions should be asked to help clarify and balance the economic, social and economic issues and that the issues should be used comparatively. We address these questions below:

- Possible alternative locations – This test follows the principle in PPW which advises that the planning system should steer development to the most suitable locations. Whilst it suggests that other alternative sites for the development should be considered in certain cases, but also advises that some existing firms may not be allowed to grow unless they can expand their existing site, or close to it. In this case, the proposal relates to the expansion of an existing site where adjoining land is in the same ownership and is available. The possibility relocating the proposed development elsewhere would defeat the overall aim of the project. The existing site is well located with good accessibility and its visual impact can be adequately mitigated. There is no certainty that any alternative location within the National Park would be less sensitive and/or have less of an impact.
- Jobs accommodated – This advises that economic growth is worthwhile wherever it is located and in the interests of economic growth the planning system should generally aim to provide land where there is demand for it. It has been highlighted that the proposal would generate additional jobs both directly as a result of the development and indirectly in the locality which should be afforded significant weight.
- Special merit – The proposal would make a special contribution to policy objectives. The proposal not only seeks the re-planning of an existing tourism site, but its expansion with the same number of holiday units together with a comprehensive landscape and tree planting scheme which would make a positive contribution to the nature conservation and biodiversity interests of the site and wider area. These are significant environmental benefits of the proposal.

10.12 The proposals for the Holiday Park as described in this application would involve a substantial level of investment which would give 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.

10.13 It is submitted the application is strongly supported by the above national policies and advice, such as in the upgrading and enhancement of the existing Holiday Park, and which would offer further social and economic advantages to the wider community.

## **11.0 CONCLUSIONS**

11.1 This application presents a single and comprehensive proposal by the Hean Castle Estate to provide an enhanced visitor experience to the Tenby/Saundersfoot/New Hedges areas of Pembrokeshire. It is contended that the proposal would represent an exemplar of a high-quality, low-density, spacious and eco-friendly caravan park development.

11.2 This application follows on from the Pre-Application scheme submitted for consideration by the Officers in 2021. Whilst we note the overall conclusion of the Officers that such a proposal was unlikely to be supported, it is suggested that the overall social, economic and environmental benefits of the proposal be reviewed and that these benefits be balanced in respect of any environmental harm which may be caused.

11.3 This Statement highlights the range of revisions which have subsequently been made to the proposal. These have included the removal of static caravans from the Green Wedge policy designation area; a further re-planning of the internal layout of the development, largely to have full regard to existing natural site features; the removal of an existing chalet managers building from the site, upon the granting of permission for the conversion of the stone outbuildings to a managers dwelling; and the inclusion of a comprehensive and detailed tree and woodland planting scheme which would form part of a wider landscape management plan for the site. This would also accrue significant biodiversity enhancements. This represents a welcome benefit of the scheme which should be afforded significant weight.

11.4 It is argued that the site is in a suitable and sustainable location for the proposed development. It relates to the expansion of an existing Holiday Park with good accessibility.

11.5 It is acknowledged that the proposal would extend the existing Holiday Park onto adjoining agricultural land, but this is argued to be a logical expansion of the site. The number of holiday units would remain at 225, although the units would now be in the form of static caravans. However, one of the main aims of the proposal is to create a lower density and more spacious and attractive development which would make a positive contribution to the locality.

11.6 The application is accompanied by a LVIA which considered that the site can accommodate an expansion to the Holiday Park without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape. The proposed development would be physically well contained and would not appear visually intrusive.

11.7 The proposed new access track to serve Rowston Farmhouse is argued to have little impact upon the character and appearance of the area. Its impact can be mitigated by its design and additional screen planting.



11.8 The proposed conversion of the stone outbuildings at Rowston Farmhouse is argued to represent a sustainable and sympathetic conversion of these buildings. Appropriate bat mitigation is proposed.

11.9 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.

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

11.11 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. The applicant is prepared to make an appropriate contribution towards a highway works improvement identified by the County Highway Authority at the Pre-application stage.

11.12 There is a need to balance the social, economic and environmental issues associated with the development. In our view, there are significant benefits arising from the proposal, as set out within this Statement. It is strongly contended that any harm identified in respect of the expansion of the site is more than offset by these benefits.

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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