



PLANNING STATEMENT AND JUSTIFICATION REPORT

REDEVELOPMENT OF FORMER MOTEL/RESTAURANT SITE FOR A MIXED COMMERCIAL AND COMMUNITY USE INCLUDING VILLAGE SHOP/POST OFFICE, BISTRO/TAKEAWAY, CONFERENCE FACILITIES AND BUSINESS UNITS TOGETHER WITH NEW VEHICULAR ACCESS, CAR PARKING AND OTHER HIGHWAY IMPROVEMENTS, LANDSCAPING AND BIODIVERSITY ENHANCEMENTS PLUS CHANGE OF USE OF ADJACENT LAND TO PROVIDE TOURISM DEVELOPMENT COMPRISING UP TO 25 HOLIDAY LODGES, TOGETHER WITH PARKING AND LANDSCAPING

ROCH GATE (FORMER MOTEL), ROCH, HAVERFORDWEST, PEMBROKESHIRE, SA62 6AF

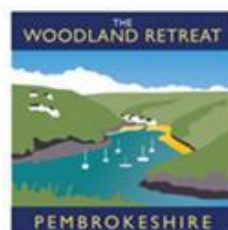


Photos of the former motel / restaurant which is now derelict / abandoned

12th September 2023



Aerial Photo of the application site (source: Bing Maps) –see Drawings G01 and G02 for application site and land within the applicant's ownership



Major Planning Application Town and Country Planning Act 1990

Head of Planning – Ms Sarah Morris
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

The Planning Studio, Hayston Bridge
Johnston, Haverfordwest
Pembrokeshire SA62 3HJ
01437 891 817
07515 851 704
andrew@haystonplanning.co.uk
www.planningpembrokeshire.co.uk

HAYSTON DEVELOPMENTS & PLANNING LTD is making this major application on behalf of Mr Nick Neumann for the following planning permission:

- **Proposal:** Redevelopment of former motel / restaurant site for a mixed commercial and community use including village shop/post office, bistro/takeaway, conference facilities and business units together with new vehicular access, car parking and other highway improvements, landscaping and biodiversity enhancements; change of use of adjacent land to provide tourism development comprising 25 holiday lodges together with parking and landscaping
- **Site location:** Roch Gate (Former Motel), Roch, Haverfordwest, Pembrokeshire, SA62 6AF
- **Type of Planning Permission:** Major Application
- **Relevant Local Development Plan Policies:** 1, 6, 7, 8, 9, 10, 11, 14, 21, 29, 30, 32, 38, 39, 41, 42, 43, 45, 54, 59 and 60
- **Supplementary Planning Guidance:** Sustainable Design and Development (May 2021); Biodiversity (May 2021); Parking Guidelines (May 2021); Minerals Safeguarding (October 2022); Loss of Hotels and Guesthouses (Interim to LDP2); Seascape (Interim to LDP2); and Planning Obligations (Interim to LDP2)
- **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 4 (Retail and Commercial Development – 2016); 5 (Nature Conservation and Planning – 2009), 6 (Planning for Sustainable Rural Communities – 2010), 11 (Noise – 1997); 12 (Design – 2016); 13 (Tourism – 1997), 15 (Development and Flood Risk – 2004); 16 (Sport, Recreation and Open Space - 2009); 18 (Transport – 2007); 23 (Economic Development – 2014) and 24 (Historic Environment - 2017)

1.0 INTRODUCTION

1.1 Please find enclosed the following supporting information:

- **Planning Statement and Justification Report** (this document)
- **Planning application form and certificate of Ownership**
- **Drawing G01**– Location Plan – Scale A3 @ 1:2500
- **Drawing G02**– Location and Ownership Plan – Scale A3 @ 1:5000
- **Drawings G03/G04** – Existing Topographical Site Surveys – Scale A3 @ 1500 and 1:1000
- **Drawing G05** – Proposed Part Site Layout Plan – Scale A3 @ 1:500
- **Drawing G06** – Proposed Part Site Layout Plan – Scale A3 @ 1:500
- **Drawing G07** – Main Building Ground Floor Plan – Scale A3 @ 1:100
- **Drawing G08** – Main Building First Floor Plan – Scale A3 @ 1:100
- **Drawing G09/10** – Main Building Elevations and Sections – Scale A3 @ 1:100
- **Drawings G11 and G12** – Business Unit Building Floor Plan, Elevations and Sections – Scale A3 @ 1:100
- **Drawing G13-15** – Indicative Lodge Floor Plans and Elevations – Scale A3 @ 1:100
- **Drawing G16** – Details of Biomass Boiler Building – Scale A3 @ 1:100
- **Appendix A** – Details of planning permission reference NP/13/0441 in respect of motel redevelopment dated 30 January 2015
- **Appendix B** – Pre-Application Addendum prepared by Landsker Business Solutions dated August 2023
- **Appendix C** –The Gate Business Plan & Financial Plan (***The Financial Plan is Private & Confidential and not for public consultation***) (dated September 2023)
- **Appendix D** – Bat Activity Survey dated, July 2023, Wyndrush Wild
- **Appendix D1**- Preliminary Ecological Appraisal, February 2023, Wyndrush Wild
- **Appendix E** – Agricultural Land Classification Letter dated February 2022
- **Appendix F** – Design and Access Statement
- **Appendix G** – Newgale Holidays Ltd Sustainability Policy
- **Planning Fee** – **£7,820.00** (*based on gross external floor space to be created by the development being 1262 sq. metres*)

1.2 This application relates to the former Motel site and some adjacent farmland located on the edge of the settlement of Roch. The applicant has recently purchased the former Motel site and which together with some of the adjacent farmland associated with Rainbolts Hill Farm and linked tourism development complex, seeks to establish a business/community hub to serve Roch and the wider local community.

1.3 The former Motel site has laid vacant for several years and is now derelict and largely abandoned. Despite an application being granted for its redevelopment as a bespoke hotel and a more recent application for an affordable housing scheme being recommended for approval by the Authority (subject to the completion of a legal agreement) neither of these schemes have materialised. These schemes were submitted by the previous owner of the site and clearly failed to deliver.



Aerial View of former unsightly Motel/Restaurant site

1.4 The application proposal comprises different business, commercial, community and tourism elements. Since purchasing the site more recently, the applicant seeks to present a different and exciting mixed-use redevelopment on the site which would be of significant benefit to the local community. The Authority has previously accepted that the site is unlikely to return to its previous use as a motel/hotel. Roch has sadly recently lost its only village shop/post office and fish & chip shop. The shop / post office closed in the last 12 months and the fish & chip shop several years ago.

1.5 The proposed business/community hub would include the provision of a replacement village shop/post office, a bistro with small food takeaway facility, rooms that would be available for conferences and local community uses, together with three small business units. There would be associated car parking, landscaping and biodiversity enhancements. The proposal would represent a high-quality development appropriate to the site in terms of its scale, form, layout and appearance.

1.6 In addition to the business/community hub, it is also proposed to create a modest tourism development comprising up to 25 holiday lodges on part of the adjacent field to the south-west. This tourism development forms part of the overall business plan for the site and to provide an income stream in support of the main redevelopment site.

1.6 We believe the proposal has the full support of both national and local planning policy. It is contended that the proposal would be compatible with the two aims of the National Park taken with the need to foster the economic, community and social well-being of the Roch and wider community. The proposal is considered to deliver significant benefits, and which should see this long neglected, prominent and largely abandoned site brought back into beneficial use.

1.7 Planning policy strongly encourages the reuse of previously developed land and mixed-use developments. Local Planning policy also supports the provision of employment and community type uses both within and adjacent to local and village centres.

1.8 Planning policy is also strongly supportive of tourism development which is one of the main drivers of the Welsh rural economy. Whilst the site is located within a sensitive landscape setting, local planning policy and guidance do allow for the expansion and establishment of tourism type developments in the countryside subject to scale, form and landscape capacity.

1.9 It is contended that the proposal would represent a sustainable form of development and that with the redevelopment of previously developed land and the various extensive landscaping and biodiversity enhancements proposed, the development can be satisfactorily integrated into the landscape without causing harm to the character and setting of this part of the National Park.

1.10 We believe the proposal has the support of both national and local planning policy. Whilst there may be some possible minor conflict with planning policy, the wide-ranging benefits of the proposal are contended to outweigh any conflict.

1.11 The applicants have submitted a Business Plan in support of the application. This sets out the applicant's personal and business background, the concept behind and further details of the development and an initial financial assessment set out within a 3-year plan for the business.

1.12 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).

1.13 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 2.64 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.

1.14 Updated planning application documentation (final 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 as also been submitted for consideration, which is attached at **Appendix F**.

2.0 LOCATION AND SITE DESCRIPTION

2.1 The application site is located to the west of the A 487 and to the south of the Nolton Haven Road on the edge of the settlement of Roch. The site lies on the eastern boundary of the National Park which follows the A 487 in this location.

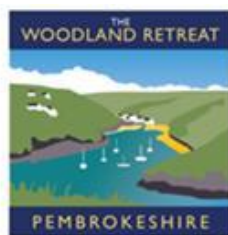


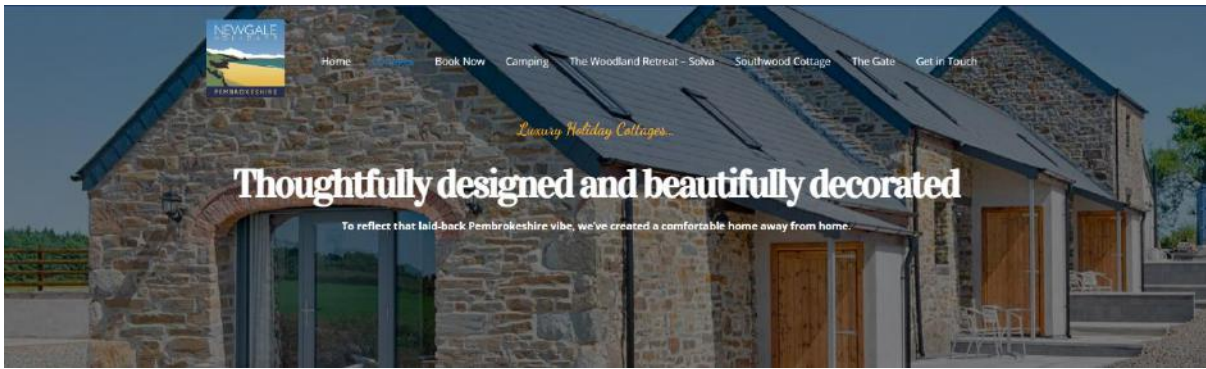
Location Plan – Drawing Extract G01

2.2 The application site comprises two main elements. The first, site of the former Motel / Restaurant which closed in 2008 and its remaining two buildings which have been derelict for some time and largely abandoned. This element also includes part of a field to the south-east. The second, part of a field located to the south-west and adjacent to the rear of the former Motel site. This adjacent farmland forms part of the land holding at Rainbolts Hill Farm / Tourism Complex.

2.3 The former Motel site has an area of 0.4 ha. The current application site has as a total area of 2.64 ha, which includes 0.89 ha for the main redevelopment site (including former motel site), 1.59 ha for the tourism development holiday lodges and 0.16 ha for the proposed drainage swale.

2.4 The applicant also owns Rainbolts Hill Farm which is located to the south which has associated farmland extending to some 143 acres. The full extent of the applicant's land ownership in relation to the application site is shown on **Drawing G02**. In addition to the farm, there is a small tourism operation comprising some four holiday cottages, camping / touring site with linked facilities, operated as Newgale Holidays Ltd. The applicant had permission (reference NP/21/0632) in March 2022 for the provision of 5 holiday lodges close to the main farm buildings, however, this has yet to be implemented by the applicant. The full extent of the land holding at Rainbolts Hill Farm is shown on the following map extract, with the current applicant site located to the far northern edge of the farm holding.





Scan of photos from [www. https://www.newgaleholidays.co.uk](https://www.newgaleholidays.co.uk) showing the tourism facilities



Map Extract Showing Extent of Land Holding at Rainbolts Hill Farm

2.5 In terms of the former Motel site, this is generally regular in shape and contains two buildings which are concentrated to the north of the site and along the western boundary. The remainder of the site is largely given over to hardstand areas and overgrown with vegetation. As such, it comprises a brownfield site. Whilst the main site itself is generally flat, the surrounding land falls away to the south.



Existing Site Topographical Survey – Drawing Extract G04

2.6 The two buildings are generally single storey in form although the western most building shows the remnants of a taller two-storey element which was the Motel Managers accommodation. The buildings are generally of masonry construction some with pitched tiled roofs but also with extensive areas of flat roofs. The buildings are in a dilapidated state having been the subject of vandalism over the years. Some of the openings have been boarded up with parts of the roofs missing. Parts are therefore open to the elements.



Aerial Photographs of the existing buildings and condition of the site



Photographs of the existing buildings and condition of the site

2.7 There is an existing vehicular access point off the Nolton Haven Road to the north. There is a low wall along part of the site frontage to the A 487 together with a grass verge. The other boundaries are generally defined by some poorly maintained hedgerows and other scrub vegetation. There is a slight slope across the site to the south.

2.8 The site is readily visible in the approach along the A 487 from the south-east. There are more limited views of the site from the west along the Nolton Haven Road. Views in the approach along the A 487 from the north-west are restricted by an area of woodland at the road junction.



View looking north-west towards the site from the A 487



View looking south towards the site from the A 487

2.9 The site is considered to have a semi-rural setting, but is well-related to the village settlement of Roch, which is within PCC planning designation and on the main A 487 road between Haverfordwest and St. David's. The site is surrounded by agricultural land to the west and south, with some pockets of woodland. The village of Simpsons Cross is located further to the south-east with the popular beach at Newgale being located some 1.5 kms to the north-west. Otherwise, there is scattered buildings and some farmsteads, including Rainbolts Hill Farm which is the home of the current applicant located a short distance to the south-east and on adjoining land.

2.10 The site lies at an important crossroads at Roch. Opposite there is Church Road which serves the village, and which continues to the east towards the historic Church and Castle which lie on the eastern edge of the village. There is also a layby and picnic area. Directly opposite on the south side of the village there is a more recent small affordable housing development known as Ocean View.

2.11 On the northern side of Church Road (a short distance from the junction) is the site where the former village shop, fish and chip shop and post office use to be (now all closed). Housing development continues along the north-eastern side of the A 487 to the north and the local community school and the Victorian Inn / Brewhouse Public House are also located a short

distance on the northern edge of the village. The Church and Castle are popular tourist attractions and there is a vibrant primary school and nearby village hall.

2.12 The main village of Roch is within PCC's Planning area and has a settlement limit adjacent to the application site. It is also deemed a service village within PCC's Local Development Plan.

2.13 This section of the A 487 is subject to a 40mph speed limit. There is a pavement on the opposite side of the road with a short section of pavement on the same side in the vicinity of the bus stop. There is a central crossing point. There are bus stops on both sides of the road with services between Haverfordwest and St. David's (service T 11).

3.0 PLANNING HISTORY

3.1 The former Motel was a long-established business which closed in 2008. During the 1990s there were various applications for additions and improvements to the business. In March 1993, permission was granted for a new function room (reference NP/92/472) and for some additional car parking (reference NP/92/477). In June 1997, permission was granted for an extension to the kitchen and alterations for living accommodation (reference NP/97/190). Later, in April 2009, permission was granted for its refurbishment (reference NP/09/061). It is unclear whether this latest permission was carried out given that it closed in 2008.

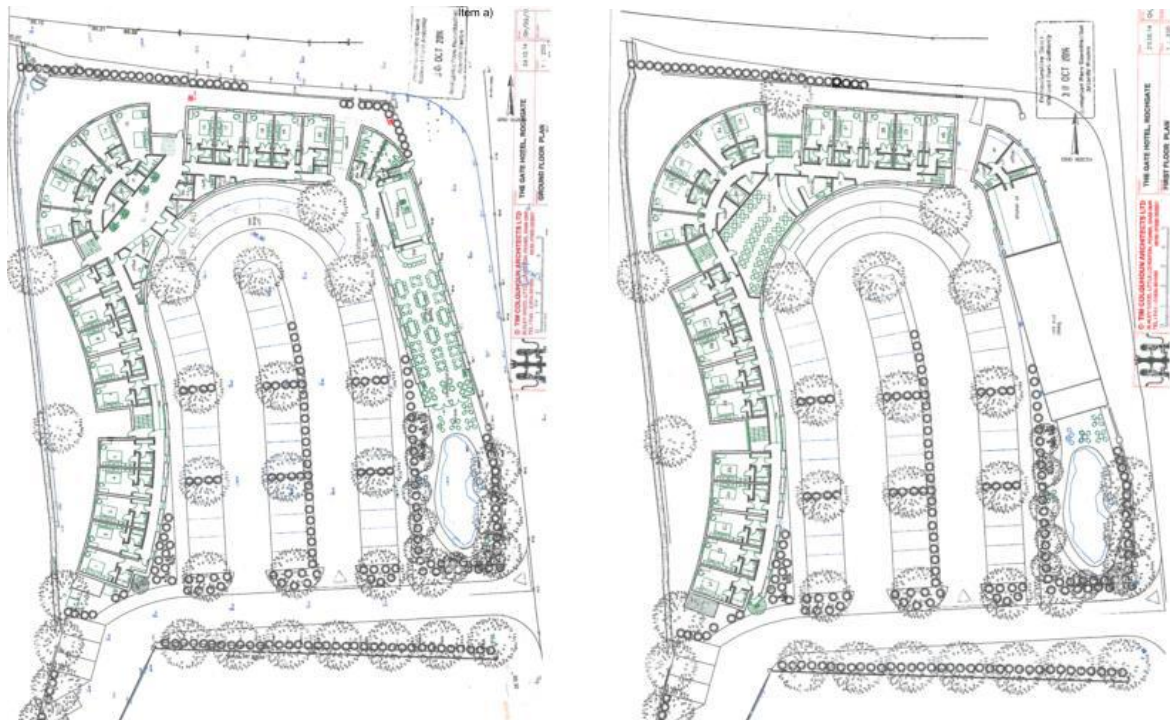
3.2 The former Motel site comprised a series of buildings on a site of 0.4 ha. In addition to the existing buildings which remain on site, there used to be a third building on the southern part of the site which no longer exists and has been left as hardstanding. This is illustrated in the following historical photograph:



Historical View of former Motel/Restaurant site

3.4 In November 2013 an application was submitted (reference NP/13/0441) for the redevelopment of the site with the replacement of the existing Motel buildings with a 40-bedroom hotel together with bar and adjacent restaurant and car parking. The application also involved the closure of the existing vehicular access to the site and its relocation to the south-east onto the A 487.

3.5 The built form of the hotel and restaurant buildings were proposed to arc around the perimeter of the site with a central courtyard parking area. The hotel elements comprised an arrangement of four two-storey blocks linked by flat roofed sections. The buildings had heights of between 6.6 m and 7.1 m. The restaurant element was in a separate building located to the east and facing the main road. This building was part two and single storey with a height up to 5.7 m. The external materials were generally in render under slate roofs with elements of timber boarding to the hotel buildings. During the course of the application, draft amendments were proposed which sought to address the concerns of Officers over certain design/elevational details.



3.6 This application was reported to the Development Management Committee in December 2014 with a recommendation for approval, subject to the receipt of amended detailed drawings. It is noted that whilst the Local Community Council supported the proposal, there were some local third-party concerns expressed over the size, scale and likely visual impact of such a proposal.

3.7 The overall conclusion of Officers was that the proposal *would ‘...result in an acceptable design approach to this important site on the boundary of the National Park. The scheme will provide a new hotel to replace is considered to be an unattractive arrangement of buildings.’* Planning permission was subsequently granted on 30 January 2015, but the scheme was not implemented and has since lapsed. Details are attached at **Appendix A**.

3.8 In May 2021, an application was submitted (reference NP/20/0155) for the residential redevelopment of the site. An initial scheme for 18 dwellings was reduced to 14 dwellings with a mixture of 6 x 1-bedroom bungalows, 4 x 1-bedroom flats and 4 x 4-bedroom houses, with use being made of the existing vehicular access to the site. The proposed site layout plan is provided below:



Proposed Site Layout – Application NP/20/0155

3.9 It is noted that objections were raised by the Local Community Council and several third parties, which amongst other concerns, questioned the proposed density and need for and type of affordable housing to be provided. However, Officers recommended approval of the application to the meeting of the Development Management Committee in July 2021 concluding that the proposal represented the exceptional release of land for affordable housing and that any refusal would likely prevent these benefits from being achieved. The recommendation for approval was subject to the completion of a legal agreement to secure the affordable housing, but this was not completed, and the application was subsequently

withdrawn by the previous owners of the site in January 2023. In our view, there was likely to be serious questions over the viability of such a scheme.

3.10 One of the key policy issues was whether the principle of the loss of the existing lawful commercial use of the site as a motel/hotel was acceptable. In accepting the loss of the existing motel/hotel use, Officers stated the following:

The site was previously used as a hotel, but became derelict many years ago. As noted in the planning history the site has a planning permission for the development of a hotel. It appears that this permission may have lapsed and there appeared no significant construction works or other works such as demolition at the site. As the former hotel is no longer in use and the proposed hotel has not been constructed, it is extremely difficult to measure the potential viability of the site for this use and also whether there is outstanding demand for hotel accommodation. Based on the current condition of the site from a site inspection it is considered that the former use of the site as a hotel has diminished to such an extent that the current policy provisions regarding loss of hotels (in Policy 36) in the Local Development Plan cannot be effectively applied.

3.12 It is considered that although there may have been benefits in putting the site to housing use, the current proposal seeks to retain the site in commercial use but with the added benefits of introducing a part community use of the site which should be welcomed by the local community.

3.13 The Authority also considered whether the site was a sustainable location for new development. Officers stated the following:

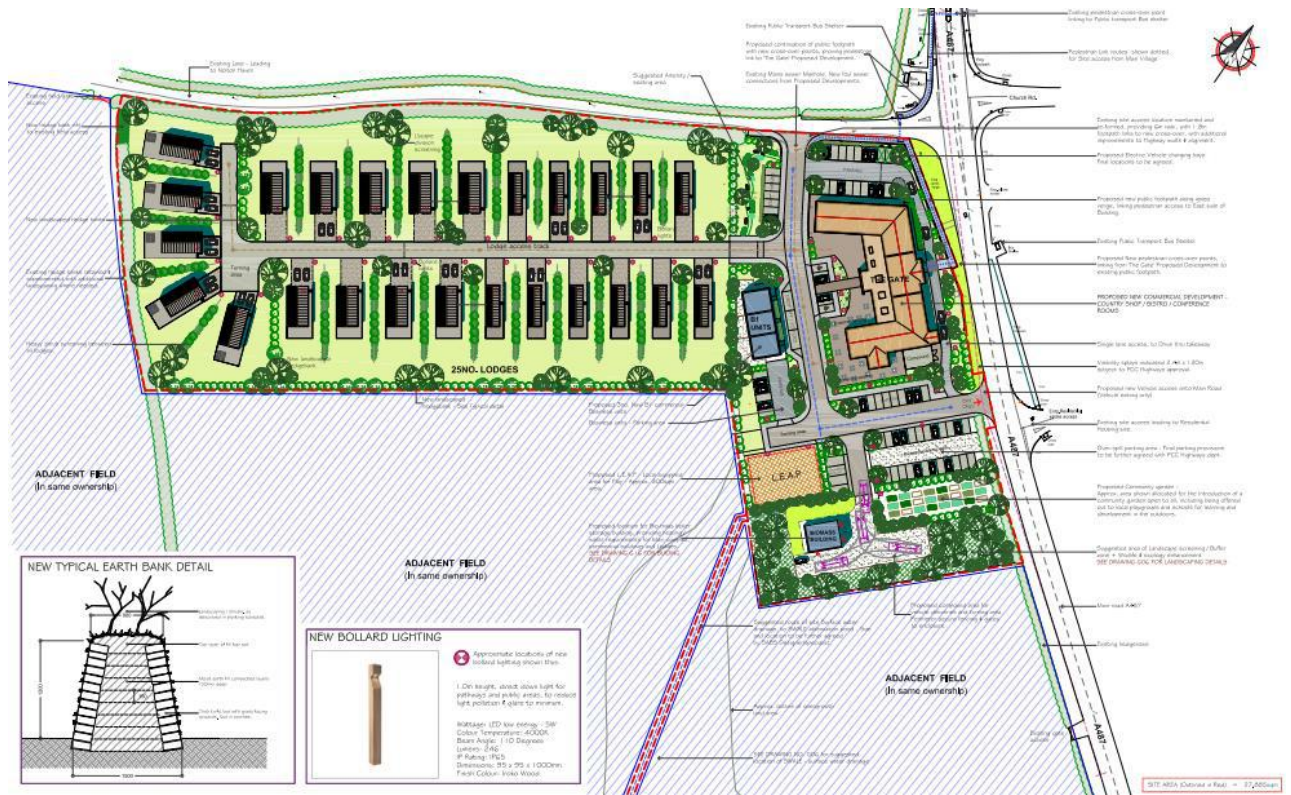
The site is separated from the settlement by the A487 and has a close relationship with the settlement positioned at the junction between the A487 and C3067. It is also previously developed brownfield land, within the definition used in paragraph 3.55 of Planning Policy Wales (Edition 11, 2021). In principle, the location of the site is considered to form a sustainable location where an exceptional release of land to meet affordable housing need would be acceptable.

3.14 Although the current proposal would involve a different type of use, if the site was deemed to be acceptable for housing, it should also be acceptable for the proposed multi-use of the site which includes business and community type developments.

4.0 PROPOSAL

4.1 This major application involves the mixed-use redevelopment of the former Motel / Restaurant site together with the incorporation of some additional adjacent farmland to accommodate part of that redevelopment together with a larger area of land to the south-west to provide a modest tourism development, meeting the definition of a caravan and under Policy 41 of PCNP Local Development Plan 2.

4.2 The application proposal encompasses different use and development elements which are described in turn below, but with the application presented to the Authority to be considered as a single comprehensive development proposal. Also noting that the site was previously in commercial use.



Proposed Part Site Layout Plan – Drawing Extract GO5



Proposed Part Site Layout Plan – Drawing Extract GO6 with landscaping and swale drainage

4.3 The proposed Site Layout Plan is shown in Drawing G06. The application proposal can logically be divided into three main parts. Firstly, the commercial/community hub located on the former Motel site, but which also incorporates some additional farmland to the south-east. This part of the application also comprises several different buildings elements together with associated car parking and landscaping. Secondly, the creation of a small tourism development on farmland to the rear south-west of the main site. Thirdly, and which is integral to the overall scheme, changes to the vehicular access arrangements together with various highway safety improvements such as to users of the development and the local community. There are also other associated works such as landscaping and sustainable drainage proposals which are also integral to the successful implementation of the proposals.

4.4 Further details of the proposed development, such as its operation and management, are set out within the submitted Business Plan provided by the applicant. This is set out in the following section of this Statement and should be read in conjunction with this section.

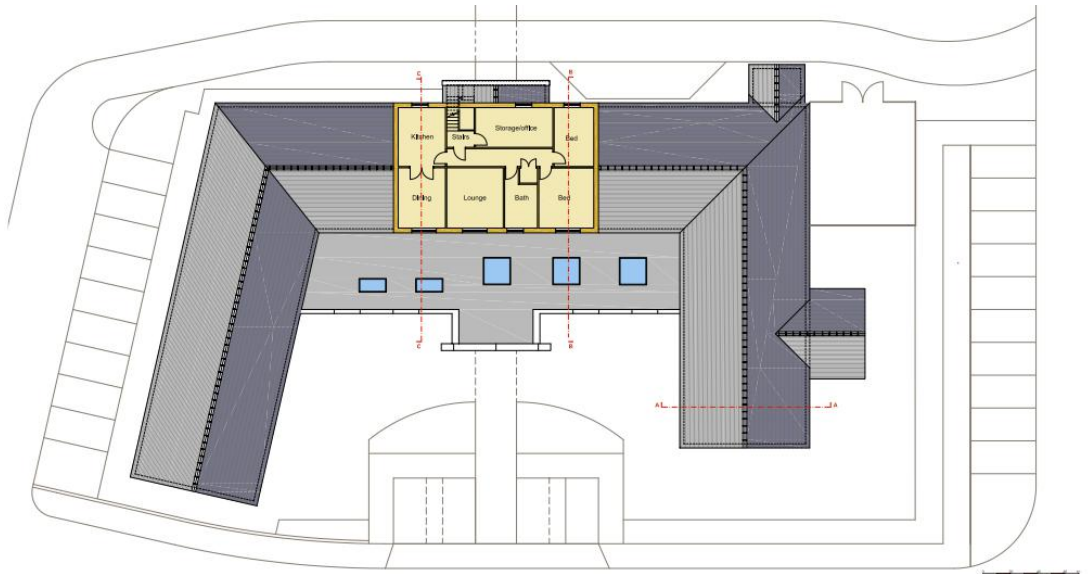
Main Business/Community Use

Main ‘Gate’ Building

4.5 This would be an irregular shaped building located on the eastern part of the site. The building would largely be single storey in form with a central section being two-storey which acts as the main entrances to the building. Internally, the building would provide a mix of uses which are shown on the proposed floor plans. There would be an external terrace area to the rear and south-eastern side for some outdoor seating together with an enclosed compound storage area on its side elevation.



PROPOSED FLOOR LAYOUT - 1:100 AT ORIGINAL DRAWING SIZE
Proposed Ground Floor Plan – Drawing Extract G07



Proposed First Floor Plan – Drawing Extract G08

4.6 The main building has a total internal floor area of 1,025 sqm (ground floor area of 900 sqm and first floor area of 125 sqm). In addition to the various ancillary facilities, such as toilets and storage rooms, the main uses of the building would comprise the following:

Ground Floor

- Village shop/post office of 178 sqm
- Two multi-functional conference rooms of total 110 sqm (with a combined seating capacity of 70)
- Bistro restaurant of 139 sqm with 68 covers (together with an overspill external seating area on the side/rear terrace (partly covered to the side).
- Kitchen area (including drive-thru facility) of 112 sqm
- Rental unit/hot desk accommodation of 37 sqm

First Floor

- Managers accommodation and storage space of 125 sqm (although this may simply be used for ancillary office/storage purposes)

4.7 The proposed building would be of modest scale, height and proportions. The central two-storey section would have an eaves and ridge height 5 metres and 8.5 metres respectively. The two single-storey 'wings' both of which extend to the side and into the rear of the site which would have an eaves and ridge height of 2.7 metres and 5.3 metres respectively. The central two-storey section would have a modest width of some 14 metres with most of the building being single storey in form.

4.8 The proposed building would incorporate various architectural features which add to the quality and visual interest to the elevations. The elevations would generally be in painted smooth render with contrasting colours being used between the two storey and single storey elevations with the pitched roofs being in natural or composite slate roof coverings. The design

includes a small area of contrasting cladding to the drive-thru section on the front highway elevation. The plinths would be in contrasting dark coloured engineering bricks

4.9 The design includes castellated gable projections on both the front and rear elevations which define the main entrances to the building. These would be in natural random stonework with slate coping detailing and it would appear as subordinate elements to the building. On the rear elevation, the building also incorporates a single storey flat roof section but with its roof hidden by castellation coping details with slate capping. The single storey 'wings' would be gable-ended. There would be a pitched roofed covered area on part of the south-eastern elevation which would act as an outside seating/al fresco area for users of the bistro.

4.10 In view of the functional use of the building, the design includes significant amounts of glazing on parts of the ground floor elevations particularly on the side and rear courtyard elevations. This would generally be in colour-coated metal or uPVC glazed screens/windows.

4.11 The upper floor of the central section would have raised gable ends with slate coping details.



Proposed south west Elevation - 1:100



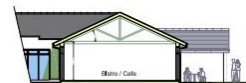
Proposed North west Elevation - 1:100



Proposed South East Elevation - 1:100



Proposed Part South East Elevation / Section C - 1:100



Proposed Section A - 1:100



Proposed Part North west Elevation / Section B - 1:100

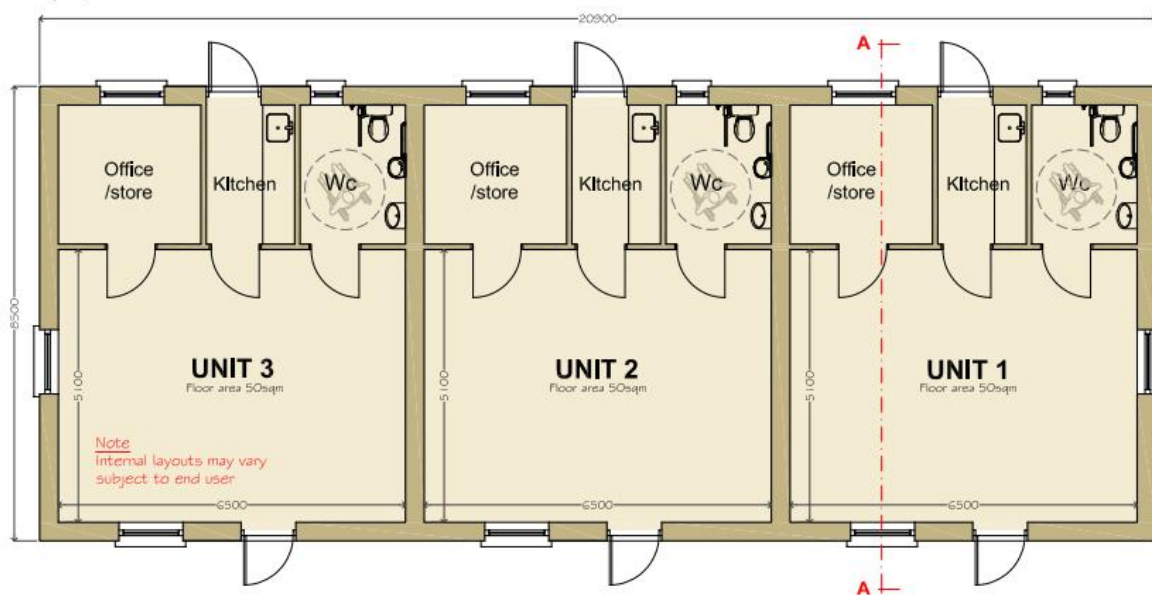
4.12 The design includes a series of solar panels on the south-eastern roof elevation of the building. Any external advertisements would be kept simple with signs likely to be required to identify 'The Gate' development, the village shop and post office, the Bistro and Drive-thru. These are likely to be subject to separate advertisement consent. The submission includes possible exterior lighting examples for the building which would be modest with downlighters or lighting facing the building. In addition to the new landscaped areas, the proposal would include appropriately designed and located bird and bat boxes on the building as biodiversity enhancements.



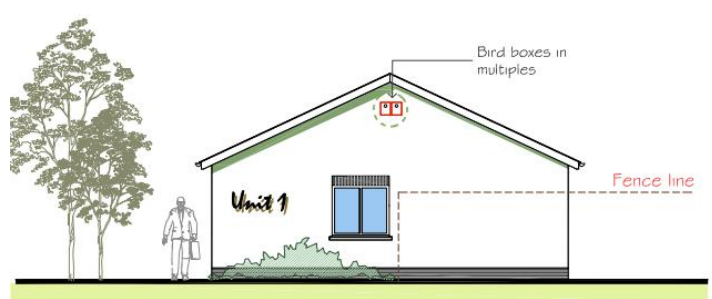
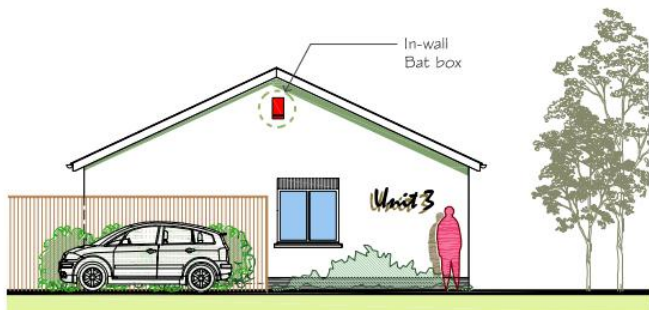
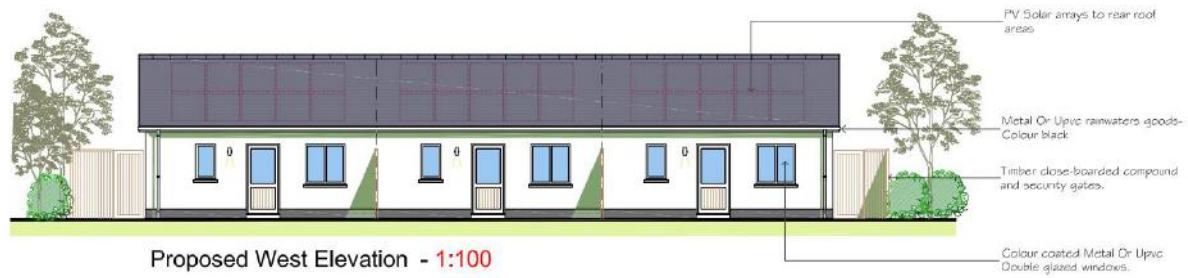
B1 Business Units

4.13 This building is located on the western part of the site almost opposite the rear entrance to the main 'Gate' building. It would provide three small business units/studios each having a floor area of 50 sqm (total 150 sqm) and external area of 182 sqm, although the final internal sizes and internal room arrangements may vary having regard to tenant's requirements.

4.14 The building would be single storey and have simple gable-ended proportions, with eaves and ridge heights of 2.7 metres and 4.7 metres respectively. The external materials would be similar to those used in the design of the main 'The Gate' building. There would be a series of rooflights on the front east elevation and solar panels on the rear west elevation.



Proposed Floor Plan – Drawing Extract G11



Proposed Elevations of the Commercial Business Units – Drawing Extracts G11 and G12

4.15 Any external lighting and biodiversity enhancements would be similar to that proposed for the main 'The Gate' building (see above).

Other Elements

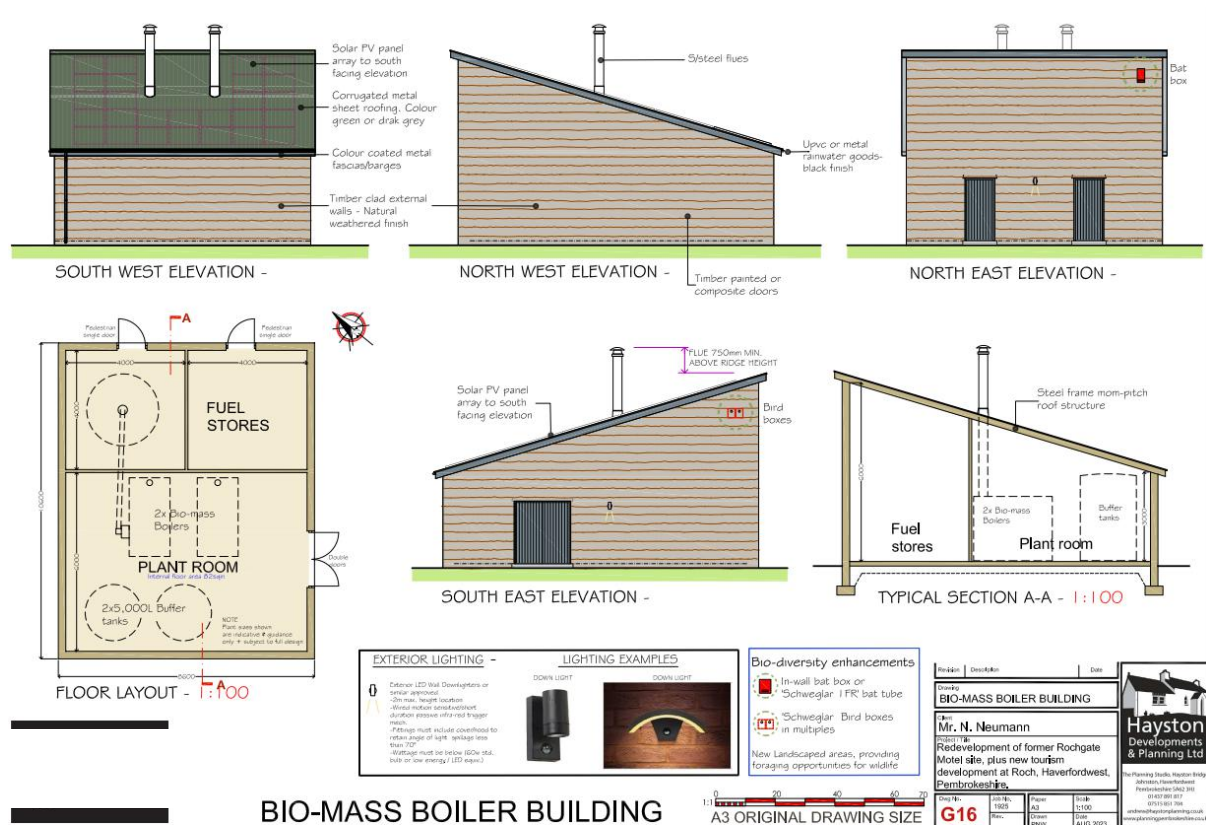
4.16 The proposal includes the incorporation of an informal amenity/seating area (community garden) located towards the north-western corner of the site and a LEAP located towards the south-western corner of the site – this would have an area of 300 sqm. Appropriate equipment would be provided, although the final design details can be secured by condition. It would be available to users of the site and the wider local community of Roch.

4.17 In addition to a robust landscaping and planting scheme across different parts of the site, the proposal includes a wide landscaped area located on the south-eastern edge of the site. This would comprise a 5-10 metre wide densely planted area with the use of native species. In addition to providing effective screening in the medium and longer term of the development in views from the south-east, it would act as a valuable wildlife buffer and biodiversity net gain. The site to the main road frontage would generally have an open aspect with some low-level planting. An existing wall would be removed.

4.18 The application includes a robust and detailed landscaping and planting scheme for the whole site, which includes medium and longer-term protection and management measures. The details are enclosed on Drawing G06.

4.19 Another significant feature of the proposal is the provision of a surface water drainage attenuation pond or 'swale' to be sited within an overgrown area a short distance to the south-west of the site. This would occupy an area of 0.16 ha. The swale would be appropriately landscaped. Whilst an alternative location within part of the field closer to the main site was initially considered, it was felt this would take up too much of the field. Final size and location would be subject to further SABS approval.

4.20 In terms of sustainability credentials, the applicant has indicated that he wishes to have a net-zero ambition for the redevelopment at the site over the mid-long term. For example, in addition to the various landscaping and biodiversity enhancement, the applicant has incorporated a biomass boiler on the site to serve the development. This could be fed by produce grown on the adjacent farm and would support the circular economy ethos. A Sustainability Policy has also been developed for Newgale Holidays Ltd (see **Appendix G**).



Scan of Drawing G16 showing details of the Biomass Boiler Building

Tourism Development Use

4.21 This would involve the change of use of the top section of the adjacent field to provide up to 25 holiday lodges (meeting the definition of a caravan) together with some associated

development. The proposed site layout plan shows the holiday lodges positioned along either side of a centrally positioned access track and turning head which would run centrally east-west through the site.

4.22 This part of the development proposals would be accessed via the rear of the main site with users of the tourism development making use of the proposed new vehicular access arrangements. There would be no separate vehicular access to this part of the development proposals. The access track would have a width of 5 metres and is likely to be suitably surfaced reflecting its semi-rural setting.

4.23 Each of the holiday lodges would be sited within their own grassed plots with two parking spaces provided on their frontages, set at least 8.5 metres apart to allow for socialising and privacy. They would effectively have three different orientations to take advantage of some of the local views, including the coast and Castle.

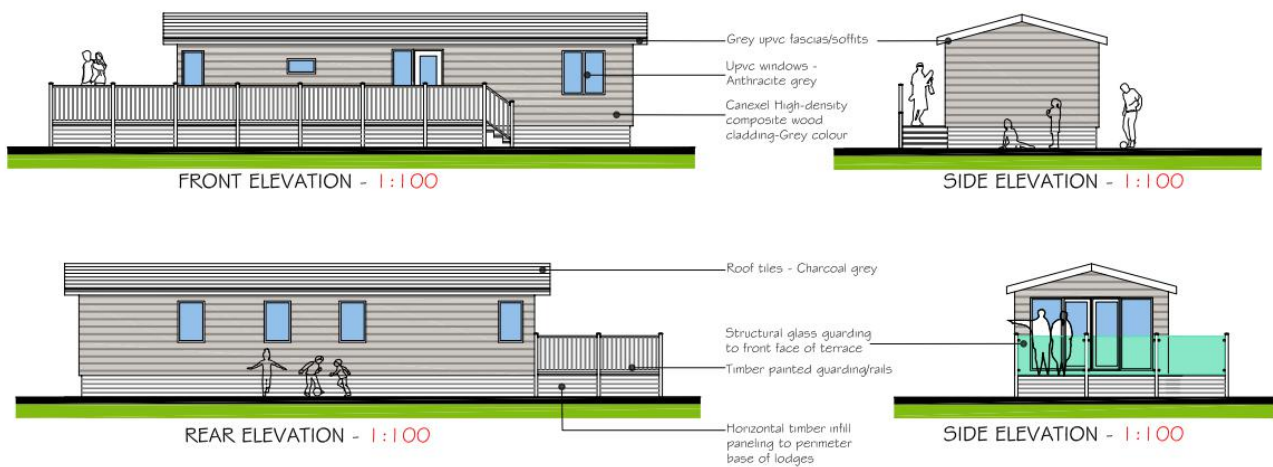
4.24 The applicant has been reviewing the site layout, and proposes 25 holiday lodges which will adopt a staggered layout with good landscaping mitigation for screening and enhancement of the amenity space. Below is a scan of **Drawing G05** showing this layout.



4.25 The initial application layout proposes 25 units, with three different lodge types. Lodge Type A 'Swift Moselle' would be a 2-bedroom unit with a GIA of 50 sqm and would occupy pitches 1-6 and 21-25

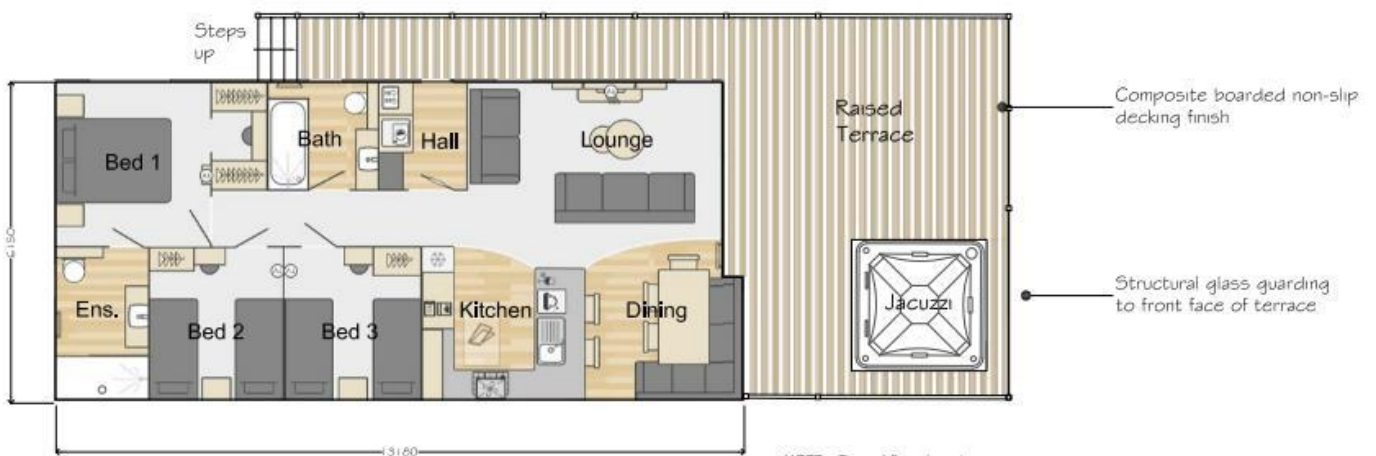


FLOOR LAYOUT - 1:100



Lodge Type A – Floor Plan and Elevations – Drawing Extract G13

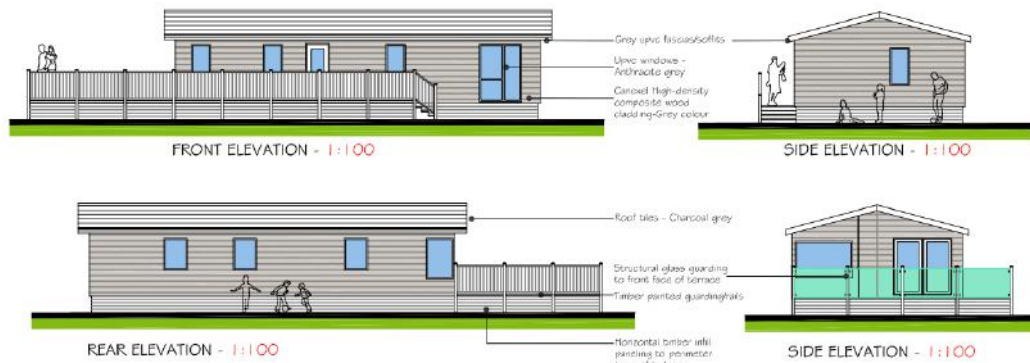
4.26 Lodge Type B ‘Swift Toronto’ would be a 3-bedroom unit with a GIA of 75 sqm and would occupy pitches 11 – 15.



FLOOR LAYOUT - 1:100

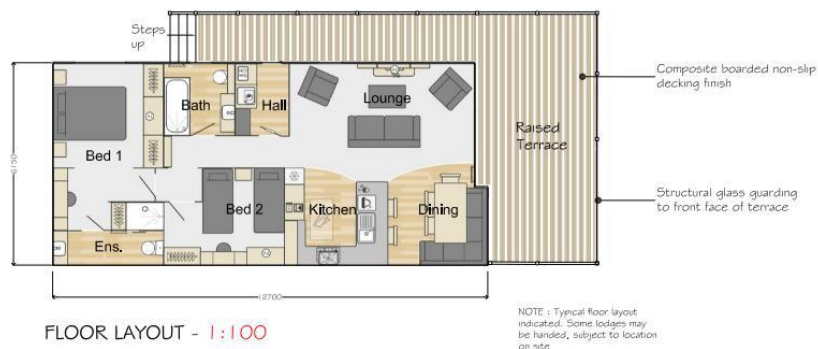
NOTE : Typical floor layout indicated. Some lodges may be handed, subject to location

Lodge Type B – Floor Plan– Drawing Extract G14

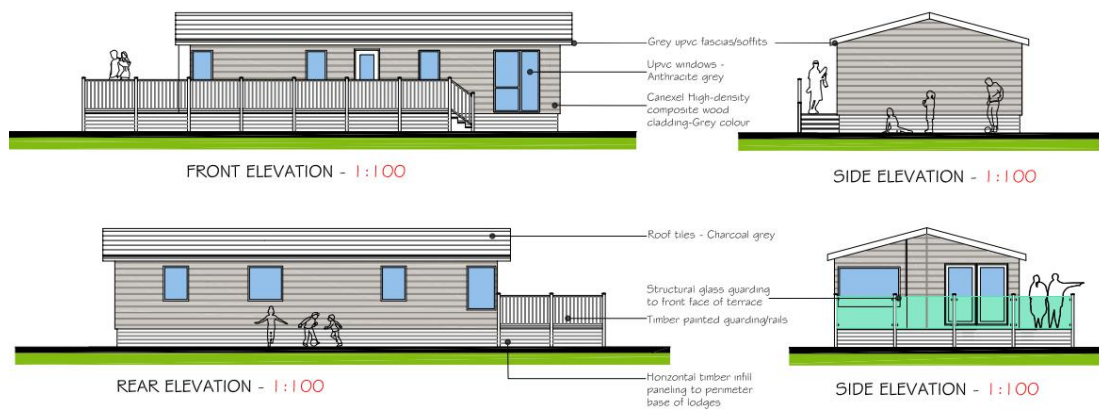


Lodge Type B – Elevations – Drawing Extract G14

4.27 Lodge Type C ‘Swift Toronto’ would be a 2-bedroom unit with a GIA of 70 sqm and would occupy pitches 7-10 and 16 - 20.



FLOOR LAYOUT - 1:100



Lodge Type C – Floor Plan and Elevations – Drawing Extract G15

4.28 Therefore, the application proposes three slightly different size of holiday lodges located on different parts of the site. The proposed holiday lodges would provide high-quality accommodation and would meet the different needs of visitors but focussing on families. All units would also have the benefit of a hot tub within part of the raided decking area.

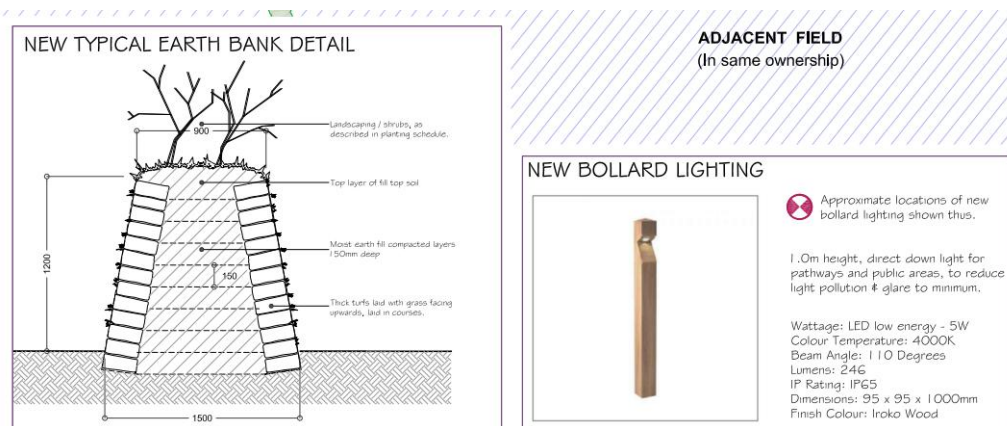


Illustrations of 'Moselle' and 'Toronto' Lodges

4.29 The smaller and narrower holiday lodges would allow for more separation and amenity space. All the holiday lodges would be of a similar design and appearance and materials – with composite grey wood cladding to the walls and grey roofing tiles. There would be raised decking areas with glazed guard rails to the rear and part side of the holiday lodges.

4.30 The existing hedge banks to the lane frontage and to the west would be retained and supplemented with additional planting where needed. There would be new landscaped hedge banks to form the new southern boundary and to separate this site from the main redevelopment site to the east. An existing field gate access in the boundary to the west would be infilled. A typical hedge bank detail is provided below.

4.31 In addition to the internal access road, parking areas and holiday lodges, the only other operational development would be some low-key lighting bollards to the pathways and public areas for safety. A typical lighting column detail is provided below:



Typical Hedge Bank and Bollard Lighting Details – Drawing Extract G05

4.32 In terms of drainage arrangements, a new foul sewer would feed into the existing public sewer system nearby via the main redevelopment site. Along with the main redevelopment site, surface water would be directed to an attenuation 'swale' located on the adjacent farmland to the south.

4.33 Because of the nature of the development, it will be possible to let the holiday lodges throughout the year thus fulfilling an objective of the Park Authority to extend the use of visitor

accommodation beyond the high summer and shoulder seasons. The location of the site makes the all year letting particularly attractive to visitors to the area around St. Brides Bay including the main settlement of St. David's and that of other settlements such as Solva and several beach locations, including that of Newgale.

Vehicular Access Highway Safety Improvements

4.34 The application proposal would make use of the existing vehicular access off the adjacent lane to the north which once served the former Motel use. Its location would be maintained and re-formed with 1.8 metre footpath links to a new crossover, with additional improvements to highway width and alignment.

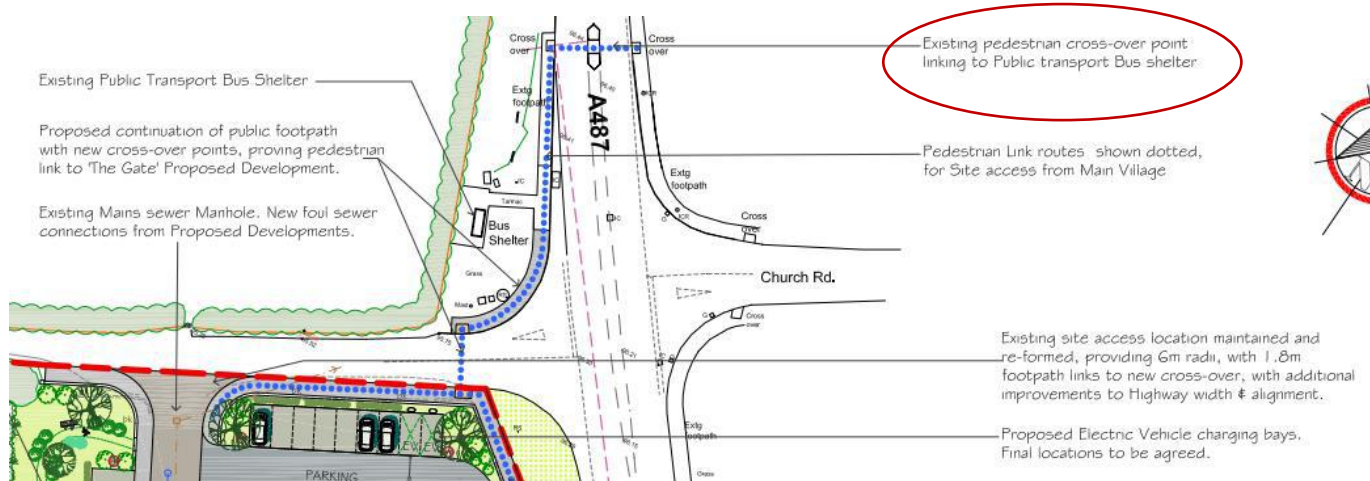
4.35 There would be a new vehicular access created to the south-east corner of the site providing an exit only onto the main A. 487 road. This would be positioned almost opposite to the entrance to the Ocean Drive residential development and would be provided with 2.4 metre x 120 metre visibility splays subject to County Highways approval.

4.36 In addition to the main access road through the site, there would be a separate single lane access located along the front of the main 'Gate' building to serve the proposed takeaway use.

4.37 In addition to the main 'Gate' building and B1 Business Unit building, an amenity/seating area, a LEAP and Buffer Landscape Zone, the remainder of the site is given over to car parking and landscaping. The car parking would be provided over various parts of the site including 7 staff parking spaces adjacent to the amenity area; 18 spaces (including 2 electric charging points) to the north; 10 spaces to the south; 6 disabled spaces to the front of the 'Gate' building and a further 6 spaces to serve the B1 Business units.

4.38 Further to the south-east, it is proposed to provide an overspill parking area with up to 24 spaces.

4.39 The various proposed highway improvements would provide improved accessibility for pedestrians and cyclists between the proposed development and the main village. These include an extension to the pavement to the north in the vicinity of the bus stop on this side of the road and the creation of a new crossing point leading from the 'Gate' building entrance to the opposite side of the main A 487 and bus stop. The submitted plan shows the nearby pedestrian links.



Scan of Drawing G05 showing the pedestrian link / crossing on the A487

5.0 BACKGROUND AND BUSINESS PLAN

5.1 Two supporting documents are attached which set out the overall background to and business concept, including the many economic and social benefits such a proposal would bring to the village and local community. These supporting documents should be read in conjunction with this main Planning Supporting Statement.

5.2 The first is an addendum which covers various positive impacts which would result from the proposed development proposals. This document (attached at **Appendix B**) covers, amongst other things, the facilities and services to be provided; local economic and employment impacts; benefits for the local community; complimentary support to other local initiatives; local support for The Gate development; the application of sustainability construction and design principles; and compliance with Welsh policy and cross-cutting themes.

5.3 A Business Plan together with detailed financial projections for the proposed development has been provided by the applicant and a copy is attached at **Appendix C**. The purpose of the Business Plan is to secure funding to develop and create the new business proposition at 'The Gate' and to help navigate the applicant and his partner in the coming months to create and develop 'The Gate.' The Business Plan demonstrates financial viability for the overall project due to its scale and reliance on having multiple and complimentary revenue scales and being able to achieve economies of scale. The versatile construction and configuration of the building, which can be adapted to suit contemporary needs, and its varied services, will help the creation of a resilient and viable business.

5.4 The Business Plan sets out the personal and experienced business background of the applicant and his long-standing connections to the local area; a business overview; a mission statement together with aims and objectives; the delivery of products and services; a market analysis, sales plan and financial considerations. The financial information provides a detailed assessment of the different elements of the proposed development, with financial projections which sets out a strong business case for the next 3 years. The adjacent proposed tourism development is essential to the success of the overall development and in terms of an on-

going income stream in providing the longer-term support of the main business/community hub to be provided on site.

5.5 The applicant explains that The Gate development and surrounding acreage is now joint with the land at Rainbolts Hill Farm, which is a farm and small tourism complex. Visitors for both The Gate and Rainbolts Hill Farm are and shall be encouraged to explore the farmland, with prior consent, to enjoy land improvement projects that have recently been undertaken.

5.6 The facilities and services to be provided below, as detailed in **Appendix B**:

3 Facilities & Services to be provided

Post development The Gate will provide the following facilities:

- Local shop and off-license selling all convenience goods and many local artisan and craft products
- Local sub-Post Office Services and Cash ATM
- Community and meeting/venue facilities that can accommodate up to 70 in partitioned rooms (accommodating 45 and 25 respectively)
- Eat in & takeaway bistro/restaurant with 68 internal covers with additional external space
- Commercial catering kitchen
- WC's for community and visitor use
- Consultation room(s) suited to outreach/satellite use for health, police, National Park etc use
- 3 Business Incubation/Rental units (<50 sq Mtr) (Three tenant enquiries already including barber, artisan bakery, outdoor adventure company)
- Vehicle parking for up to 71 vehicles around the Gate building with provisions for disabled and commercial vehicle users.
- 25 high quality Lodges, (equivalent to Visit Wales 5 star self-catering accommodation grading) in landscaped grounds each with own designated parking area
- Community garden and orchard and woodland trail around spring fed ponds
- Designated, secure dog walking area (complimentary to Newgale Summer dog restrictions)
- 2 Electric Vehicle charging points
- Bicycle park and repair area
- DPD (or similar) collection and drop-off points
- Free open wifi, with good iCT and video conferencing.

The following services will be provided:

- All year round trading with the Gate opening trading hours to suit community use with extended opening hours during peak tourism periods
- The Gate community and visitor building will be open all year round which will help alleviate visitor numbers to "hot spot" areas within the National Park, especially during peak tourism periods. The Gate Lodge Park will trade according to the consents granted for it.
- Drive through services for café which will be a local, independent business, that will source, where possible, local food and drink products
- Direct access to public footpath to Newgale beach and connecting to Wales Coastal Path
- Bilingual staffing, signage and educational interpretation demonstrating connectivity to the farm and care for the environment
- Provision of modern, versatile venue suited to a wide range of community, business and other organisation's use (e.g as base or meeting and education point for local activity providers, Health 7 Wellbeing classes etc)
- Check in point for those walking the Wales Coastal and Pembrokeshire National Cast paths
- Adjacent to village bus stop to increase use of public transport and minimise private vehicle use
- Local litter picking services around and adjacent to the site.

5.7 **Section 3** of the Plan sets out the aims and objectives including overall mission statement. It sets out the business objectives over the short term (0-12 months), medium term (12-36 months) and longer term (36-60 months) with the aim to open The Gate holiday lodges and hub in line with the business plan – by Spring 2025.

5.8 **Section 4** provides more information in relation to ‘The Gate’ development and sets out the several new facilities which would be added to the village of Roch, which can be used by both local people and visitors alike. It is explained that whilst the holiday lodges will be separate from ‘The Gate’ hub, it would be easily accessible through the site.

Village Shop and Post Office

It is explained that after the sad, recent closure of the village stores, the village and surrounding areas has been left without a shop, takeaway, post office and fish and chip shop services. This has had a devastating impact on the community and local morale.

The village shop shall feature within the centre of ‘The Gate’ hub and will showcase locally produced products. The shop is likely to be open from 8 am to 8 pm. The Post Office facilities will also be available within the village shop, with a separate area of the shop being dedicated to this important local service. The post office is likely to be open 3-5 days a week. The following imagery depicts the theme and aesthetics of the shop. Also the applicants are exploring pharmacy dispensary options. The former shop in Roch had a collection point for prescriptions and there is now no pharmacy between St Davids and Haverfordwest. Discussions have taken place with Wells and Lloyds pharmacies to explore this option.



Typical Internal Images of Shop

The Bistro Restaurant

The development will introduce a new eatery in the village of Roch, one which shall truly encompass the area and provide locally sourced produce where possible. It is intended that the facility will serve guests all meals of the day, with opening hours of 8.00hrs – 22.00 hrs throughout the full week. The approximate number of covers are shown on the submitted site layout plan, which includes use of the adjacent exterior terrace. Internally, the facility will have traditional agricultural features with a contemporary/industrial feel. An example of the limited menu is provided in the Plan.

The Drive - Thru

The applicant would like to introduce a new concept to The Gate, one which he believes shall capture the passing trade along the A 487 which runs past the site. The facility would have features similar to other establishments and would have a limited menu, with an example being provided in the Plan. It is anticipated that the facility would provide a breakfast and lunch service from the early morning to the early evening (8 am to 8 pm) and would be seasonal, with perhaps more limited opening in the 'closed' months.

Multi-Use Conference Rooms

These two rooms would occupy a smaller part of The Gate building and would be available for various community functions and activities. This would be operated on demand which have early starts with say fitness/yoga classes before work through to evening meetings. Openings hours could be 6 am to 8 pm.

Community Garden

To give back to the local community, the applicant aims to give back to the local community with the introduction of a community garden. The space will be open to all, including being offered out to local playgroups and schools for learning and development in the outdoors. Its likely appearance is illustrated below:



Play Area (LEAP)

To occupy the younger visitors to The Gate, a gated play area being introduced to the development. It is anticipated to have equipment for the younger (1-4) and older (5-12) age groups to ensure that all children can enjoy the area. In addition to the type of play equipment envisaged illustrated below, there would be picnic benches for parents/guardians. The facility is to be located away from the main road but within reasonable proximity to the main Gate building.



The Lodges

At present, there will be a total of 25 holiday lodges introduced to the site at The Gate. It is intended that 20 of the holiday lodges would be available to purchase under a medium-long term lease agreement, with 5 retained and managed by Newgale Holidays and available for short-term rent.

It is explained that the applicant has considered a variety of holiday lodges for the development. The different types proposed would provide a high-standard of accommodation set within a high-quality and spacious, landscaped setting, being available as 2 and 3-bedroom units, and would come in different 'packages.' The premium level package is to be chosen by the applicant.

Staff Requirements

The applicant has explained that although the business will be managed and maintained by them, but overtime and once it becomes established, there would be various employment opportunities. These are set out at section 4.9 and where the applicant has indicated that such a proposal is likely to generate a significant number of employment opportunities. A future formal submission will clarify the likely of employment once the development is complete and operational.

5.9 **Section 5** provides a marketing analysis together with a brief review of the Welsh tourism economy, the targeted visitor profile and a review of other tourism accommodation, catering

establishments and farm shop competition in the local area. It is argued that the National Park is becoming a thriving tourist hotspot, which has seen number of visitors grow year on year and that the offering from The Gate hub is intrinsic and new, and there is no similar offering nearby.

5.10 It is explained that 'The Gate' will attract a family-oriented customer base that are looking for unique and high-end retreats to stay in the heart of the countryside with elements of seclusion. The forecasted letting periods will be for weekend breaks or short complementary breaks throughout the year. With the holiday lodges operational all year round this allows the business to continue trading outside of the seasonal trends which is an added selling point within a tourism driven economy.

5.11 There are many local attractions nearby which attract visitors year on year which are set out at section 4.6 of the Plan.

5.12 **Section 6** sets out the intended marketing and sales plan.

5.13 **Section 7** provides a Financial Plan together with a 3-year cash-flow, profit and loss and balance sheet projections for the different elements of the business proposal, and in overall terms. The Plan covers the different aspects of the proposed development.

6.0 PLANNING POLICY BACKGROUND

6.1 This comprises policy documents at the national and local level as summarised at the beginning of this Statement. The policy assessment is addressed in two parts – firstly at the local level and then at the national level.

6.2 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.

6.3 For the purposes of the LDP2, the site is located within the countryside and outside the defined settlement boundary of the village of Roch (which lies just outside the National Park boundary). The site is also within a Mineral Safeguarding Zone, an area of Low Coal Risk and has the potential for Surface Water Flooding. However, the site is with an area at a low risk of flooding.

6.4 The village of Roch is predominantly in the County Council's planning jurisdiction and is identified as a settlement within the Pembrokeshire County Council's Local Development Plan, where it is identified as a Rural Settlement – Service Village. The National Park boundary runs along the main road to the east of the application site. The LDP2 identifies Roch as a Rural Centre (Policy 6). The proposals map identifies the Centre Boundary for Roch and this does include the application site. It therefore lies within countryside.

6.5 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 6 – Rural Centres
- Policy 7 – Countryside
- Policy 8 – Special Qualities
- Policy 9 - Light Pollution
- Policy 10 – Sites and Species of European Importance
- Policy 11 – Nationally Protected Sites and Species
- Policy 14 -Conservation and Enhancement of the Park
- Policy 21 – Minerals Safeguarding
- Policy 29 – Sustainable Design
- Policy 30 – Amenity
- Policy 32 – Surface Water Drainage
- Policy 38 – Visitor Economy
- Policy 39 – Loss of Hotels and Guest Houses
- Policy 41- Caravan, Camping and Chalet Development
- Policy 42 – Site Facilities on Camping, Chalet and Caravan Sites
- Policy 43 – Employment Sites and Live/Work Units
- Policy 45 – Farm Diversification
- Policy 54 – Community Facilities
- Policy 59 – Sustainable Transport
- Policy 60 – Impacts of Traffic

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

7.0 LOCAL 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.

7.1 The application proposals incorporate different parcels of land and proposes a mixed-use development of the site – including the redevelopment of the former hotel/motel site and some adjoining farmland for a modest tourism development.

7.2 It is contended that the envisaged development would meet the requirements of Policy 1. For the reasons set out in this Statement and having regard to the additional supporting information provided as part of the Business Plan, the proposals would clearly foster the economic and social well-being of the National Park. Mixed-use developments, which in this case includes community facilities and services, are strongly encouraged by national and local planning policy.

7.3 The proposed tourism development incorporating 25 holiday lodges would be suitable for all year use as holiday accommodation and can therefore contribute to maintaining economic activity in the St. Brides Bay area at a time when traditional camping and caravan holidays are less attractive. The proposal would diversify the type of holiday accommodation already on offer at Rainbolts Hill Farm (in addition to the holiday cottages and camping site) and which is required to provide additional income to support the main 'The Gate' development.

7.4 The proposals have the potential to support the local rural economy, such as in providing additional facilities and services, in bringing more visitors to the area and which would encourage spending at local tourism facilities and in nearby settlements, such as St. David's, Solva and Newgale.

7.5 The proposals would conserve and enhance the natural beauty of the National Park. A significant part of the proposals would involve previously developed land, the redevelopment of which should only represent a welcome improvement to the appearance of the site and an enhancement of this area of the Park.

7.6 The proposed tourism development would represent a relatively low-key use and the layout and high-quality design of this development would minimise its visual impact on the landscape.

7.7 Given the nature of the development involved, it offers the significant potential to increase the public understanding and special qualities of the Park.

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).

7.8 Whilst the site lies within a countryside location for planning policy purposes, it is submitted that the proposals would fall within several types of development which can be acceptable in the countryside. The proposals would fall within categories (b) as a form of farm diversification in the provision of a village shop (being partly linked to the land and farming operations at Rainbolts Hill Farm); (d) as a rural enterprise or tourist attraction where the need to locate in the countryside is essential; (e) where a new or extended community facility is proposed; and (h) where land is released at the edge of a Centre for a small employment site. The proposals would be in accordance with relevant Policies 38, 41, 43, 45 and 54 as demonstrated later in this Statement.

7.9 These policies clearly indicate that various types of new development can be acceptable not only within but on the edge of settlements, including smaller settlements in more rural locations. Further, tourism developments are quite often situated in more rural locations, subject to their scale and capacity of the landscape to accommodate such development.

7.10 Related to the above is **Policy 6** which sets out the land use priorities for Rural Centres. In addition to the provision of new housing through various means, it permits small scale employment development, seeks to protect and enhance the Centre's range of facilities, seeks to ensure developments permitted contribute to the protection and enhancement of the special qualities, and that it is of a size and scale consistent with the character of the Centre.

7.11 Whilst the application site is located outside the defined Centre boundary, it is physically and visually closely related to the existing village settlement. Part of the proposal would involve the redevelopment of a former motel/hotel site and with the provision of a new village shop would reintroduce this valued community facility. Some small-scale employment development is also proposed.

7.12 The site is argued to be a sustainable location for new development. For example, on the Pembrokeshire County Council side of the boundary, there is a housing site allocation with a PAC application currently before the Council for the erection of some 52 dwellings at land east of Pilgrims Way, Roch (the approved black plan is scanned in on the next page). Further, we understand that a local Community Land Trust is involved in possibly bringing forward a site on land near the School for some affordable housing by the primary school in PCNP

- 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.**

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

7.14 Whilst the proposal would involve some encroachment into the surrounding countryside, it would also partly involve the redevelopment of a brownfield site which was once occupied by a motel/hotel. One commercial use would be replaced by another. Whilst now vacant and abandoned, this previous use would have generated a significant amount of traffic and activity. The proposed tourism development would be a modest development of 25 holiday lodges and where additional activity generated by this adjacent development would be limited. The location of the site is such that the proposal should be read within the context of the existing village settlement and the main A 487 road which passes the site. Therefore, any sense of remoteness and tranquillity would be limited and would not be lost.

7.15 The application site is located on the opposite side of the village settlement being separated by the main A 487 road. The proposed new buildings would be confined to the main body of the previously developed site with some adjacent farmland to the south-east being taken for a new exit access and some ancillary development. The proposed tourism development would be to the rear and away from the road. Careful consideration has been given to achieve a high-quality development. As such, the proposals would not result in the character and identity of the village being lost, through undesirable coalescence or ribboning development.

7.16 Whilst there would be some encroachment into the countryside, the overall pattern and diversity of the landscape would at least be protected. The most significant hedge banks and hedgerows would be retained and supplemented where necessary.

7.17 There are no buildings or features of historic interest which would be affected by the proposed development. The site is isolated from the nearest listed buildings: Roch Castle and Church and Southwood, with the built form of the main village intervening and providing a significant visual barrier. It is noted that the Authority's Heritage Officer raised no objection respect of the previously withdrawn housing scheme with regards setting. The site is also

isolated from other historic environment features such as scheduled ancient monuments and conservation areas.

7.18 The application site is located away from the more sensitive undeveloped coast and the Coast Path. It is likely that any potential views of the development from this direction, particularly given siting and low profile of the development, would be very limited and at best been seen from a distance and against a backdrop of the existing village settlement.

7.19 In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact have been given special consideration in the planning of the development. For example, the development would have a close physical and functional relationship with the existing village settlement and where the layout and form of development can be satisfactorily integrated into this sensitive landscape.

7.20 The proposal would protect and enhance the site's green infrastructure and the biodiversity interests of the site. The application is accompanied by a Bat Activity Survey (by Wyndrush Wild) which is attached at **Appendix D**. In addition, **Policy 11** seeks to have regard to various nature conservation interests, such as sites and species of importance, together with their protection, mitigation and enhancement wherever possible.

7.21 The Survey focused on the former hotel/motel site and where the main aims were to establish whether the abandoned buildings were being used by bats, the potential impact on bats and the scope for mitigation/enhancements. This Survey followed on from a previous survey carried out in 2017 by Kite Ecology and an external Preliminary Bat Roost Assessment found no evidence of roosting bats at the site proposed for redevelopment; however, locations were identified for opportunistic roosting.

7.22 The main findings of the new Survey were as follows:

- Neither the daytime nor activity surveys identified any evidence to suggest that the buildings are used as a bat roost.
- The site is located within an area of optimal foraging opportunities for bats with the site's proximity to hedgerows, tree lines, pasture and watercourses. These hedgerows and tree lines connect areas of tree-lined watercourses and the wider landscape.
- No protected sites were found within 10 kms of the site.
- Bats do not appear to be a constraint to development of the site. However, in the event bats are discovered, it advises that works should cease, and further ecological advice sought.
- In terms of possible enhancements, the Survey recommends the installation of bat boxes on buildings within the development. To this end, both bat and bird boxes have been included within the development.

7.23 A Preliminary Ecology Appraisal was undertaken on the adjacent farmland by Wyndrush Wild in February 2023 and the recommendations and conclusions of this report are scanned in on the next page and attached as **Appendix D1**.

4.2 Recommendations

4.2.1 Running Water

Although there is no permanent running water on site, the damp ground in the central corridor marks the head of the Bathesland Water, a stream which drains into the nearby West Wales Marine SAC. Cessation of slurry inputs to the currently intensively managed fields may well reduce nutrient pollution here, but construction and any ongoing drainage associated with the scheme should be mindful of the potential for pollution to reach the stream. Depending on the nature of the scheme, the potential for impact pathways on the nearby West Wales Marine SAC may require consideration.

4.2.2 Breeding Birds

Any clearance of woody vegetation should take place outside of the bird breeding season (March 1st – August 31st), unless specific survey for nesting birds is undertaken. Retention of the current area of scrub in the centre of the site is desirable to maintain breeding dunnocks and potentially other Birds of Conservation Concern.

4.2.3 Lighting

To reduce or avoid potential impacts on nocturnal wildlife, any external lighting associated with the scheme should be minimised. Lights should be downward-directed and hooded to avoid excess light-spill, and on time sensors with a short duration. LED lighting, although energy-efficient, has been found to impact more significantly on moths, good populations of which might currently be expected within the woodland and scrub areas around the site.

4.2.4 Invasive Species

Two high-risk invasive species are present on site, and a Biosecurity Risk Assessment should be required to detail how these will be treated prior to site development. Any landscaping associated with the scheme should avoid the use of such known invasives, together with other potentially invasive species listed by [Thomas \(2010\)](#). Use of locally-native species or natural regeneration should be preferred.

4.3 Promotion of Biodiversity at the Site

Pembrokeshire Coast National Park Authority requires that biodiversity enhancements are included in all developments to meet the Authority's Duty of Care under Section 6 of the Environment Act 2016.

Any relaxation of the intensive grassland management regime currently in place will begin to provide biodiversity benefits. Cutting and removal in the absence of any fertiliser or slurry inputs would be needed for many years before wildflowers are likely to benefit, but nutrient-enrichment of the adjoining damp ground and damp hollow / former pond would also lessen.

The damp hollow could be excavated as a shallow wildlife pond, with the vegetation and spoil removed well away from the edge.

Defunct hedgerows could be re-established through planting of suitable locally-appropriate native species. Any other tree planting proposed should also use locally-appropriate broadleaved species.

Some biodiversity features could also be incorporated in the landscaping associated with the development, and this will certainly be the case if good 'wildlife gardening' principles are employed, using native species where possible. Bat boxes could be incorporated within the proposed new buildings.

5. Summary and Conclusions

The proposed development does not impact on any protected habitats. No protected species are likely to be affected, although bat survey will be carried out prior to building demolition to ensure that no roosting bats are present. Opportunities exist to provide biodiversity gain, for example through changes to grassland management, pond creation and re-establishment of hedges.

7.24 Additional landscaping and native planting are proposed within and around the boundaries of the site as part of a robust and detailed landscaping scheme. The details have been set out earlier in this Statement. Whilst some vegetation would be affected to the south-east of the site, with some frontage hedgerow being removed to allow the new vehicular access exit, this loss would be relatively minor and would be more than compensated by the new landscaping and planting proposed. One of the key features of the proposals is the creation of a wide landscaped buffer zone along the new south-eastern boundary, which would provide a significant biodiversity net gain.

7.25 The proposed drainage 'swale' would be located within an area of overgrowth on part of the surrounding fields. This would provide a new water feature and suitably landscaped, would also provide a further biodiversity net gain.

7.26 Therefore, the proposals have had full regard to the relevant special qualities of the National Park.

Policy 9 Light Pollution

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

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

7.27 No significant level of external lighting is anticipated from the proposed development. Firstly, part of the proposals relates to a previously developed site which once had a commercial use with various external lighting features. The site is also adjacent to the main A 487 and seen within the context of the village settlement.

7.28 The proposals would involve a low-level and external lighting scheme, the details of which have been set out earlier in this Statement. These would include downlighters on the elevations of the proposed buildings with low bollards within the outside public and pathway areas. The final details of any external lighting can be controlled by condition. The design of the proposed lighting would respond to the sensitive landscape setting of the site but also to protect nature conservation interests.

Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park

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

- a) causing visual intrusion; and/or,**
- b) introducing or intensifying a use which is incompatible with its location; and/or**

- c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or
- d) losing or failing to incorporate important traditional features.

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

7.29 The assessment of the potential visual impact of the development has partly been addressed within the earlier sections of this Statement. It is contended that the visual impact of the development would be acceptable in this location.

7.30 The first part of the application involves the redevelopment of the former motel/hotel site together with the incorporation of some additional farmland to the south-east. This site is clearly visible from the main road and particularly in the approach from the south-east, due to local topography. It can therefore be accepted that any redevelopment of the site would be visible.

7.31 The layout, scale, height, form and appearance of the proposed redevelopment are considered to blend in with the surrounding development. Most of the development would be single storey in form with the proposed landscaping integrating the developments into this edge of village location. It was recognised as part of the previous application for housing that there was a need for significant landscaping mitigation to the south-east which open and exposed. Hence, the proposals include a wide landscape buffer along the south-eastern boundary of this part of the site. This would be far more significant than the landscaping proposed as part of the two previous redevelopment schemes.

7.32 The proposals would involve the inclusion of some farmland to the south-east, principally to accommodate the access road exit, some overspill parking and a LEAP. However, a significant part of this would be given over to a wide landscaped buffer zone.

7.33 The second part of the proposal would involve a modest development of up to 25 holiday lodges together with associated internal access, car parking and landscaping. The proposed holiday lodges would be set within a spacious landscaped site, with most of the site remaining as grass and suitably landscaped. It is acknowledged that the site is located on rising ground, it would represent a low-lying development. Given the modest proportions, height and overall design of the holiday lodges, any impact upon the wider landscape would be limited and not harmful. The amount of car parking proposed would be limited and suitably surfaced. The site is located back from the A 487. Any views from within the wider landscape would be obscured by existing and proposed boundary screening.

7.34 In terms of the previous housing scheme, Officers commented the following:

'In the landscape, it is considered that the proposal would appear as a logical extension to the northern extent of Roch at a road junction. It is also considered that the removal of the existing buildings at the site would represent an element of planning gain, given their rundown appearance.'

7.35 It is not considered that the proposal would have any additional visual impact than the two previous redevelopment schemes. Indeed, it is strongly this proposal could be argued to involve far less development, particularly when compared with the previously permitted hotel redevelopment scheme. That represented a substantial development which would have a significant visual impact. The current proposal would also represent a far higher quality and sympathetic development of this site.

7.36 The nearest public right of way is located some distance to the south-east (No. PP80/14 and 15) which links the village of Roch with Nolton and Nolton Haven to the south-west. Given the distance involved, the site is unlikely to be visible from this direction.

7.37 The proposal would not introduce or intensify a use that would be incompatible with its location. Part of the proposal would replace a former hotel/motel use on the edge of a village settlement, but also noting the planning history background on the site. The site lies next to the A 487 and main road network. The proposed tourism development would simply represent a logical extension to existing development.

7.38 The proposal would not lose or fail to incorporate important natural features. Whilst the site contains few natural site features, most boundary hedgerows and vegetation would be retained, supplemented and integrated into the scheme. The provision of a drainage 'swale' on land to the south of the site would simply appear as a natural water feature in the landscape.

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

7.40 **Policy 21** relates to Minerals Safeguarding which seeks to ensure that mineral resources which may be required by future generations are not unnecessarily sterilised by permanent development. The Authority will take account of the presence of shallow or surface mineral resources in considering planning applications which would otherwise sterilise these resources. The site is identified to lie within a Minerals Safeguarding Zone which covers a wide area. However, part of the site already comprises previously developed land and is suitable for redevelopment. Whilst part of the proposals involves some adjacent farmland, the siting of holiday lodges would not be the same as 'permanent development' and are moveable, and therefore would not sterilise resources, although such activity is extremely unlikely.

7.41 **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.

7.42 The main part of the proposals would involve the redevelopment of previously developed land. The existing site and buildings are abandoned with no prospect of reuse. The main part of the proposal would comprise new high-quality buildings which would be put to various business, commercial and community purposes. The buildings would be built to a high design standard, with local building materials to be utilised where possible. The proposed development would have high 'green sustainability' credentials, including high energy efficient

buildings together with the use of renewable energy options. See **Appendix G** for Newgale Holiday Ltd's Sustainability Policy.

7.43 The proposal also involves the provision of holiday lodges on the adjacent site. The proposed holiday lodges are functional yet simple in their design which respond to the local distinctiveness of the area and would be constructed to modern day standards with high levels of energy efficiency. The materials used would be appropriate. This type of holiday accommodation is commonly acceptable in countryside locations, including a recent permission for 5 holiday lodges at Rainbolts Hill Farm.

7.44 The proposals would allow for suitable access for all users of the site. The site is generally level, with a slight slope further to the south-east. There would be good accessibility throughout the site with most of the development being at ground floor level.

7.45 The proposals would be served by adequate sewerage disposal facilities connection being made to the existing mains sewer system in the locality.

7.46 **Policy 30** specifically deals with **amenity** and aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. The only nearby development potentially affected by the proposals would be the occupiers of Rochgate Cottages located at the Church Road junction and the occupiers of Ocean Drive on the opposite side of the main A 487 road. On the opposite side of the road there is also a bus stop, parking area and small link road set back from the main road. However, the properties are set back from the main road frontage with the nearest houses being sited end-on to the main road.

7.47 The first point to highlight is that the main site was once occupied by a hotel/motel and that previous redevelopment schemes for either a new hotel or housing have been accepted on this site. The new hotel redevelopment also included the creation of a new vehicular access onto the A 487.

7.48 Having regard to the above, it is not considered that the amenities of these residents would be adversely affected by the proposals. Whilst the proposals would introduce additional traffic and activities on the site and would have some impact, many of the proposed uses can be controlled by condition, such as in respect of the type of uses and hours of use to limit any impacts.

7.49 **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. Part of the proposals relate to a previously developed site and the amount of new hard surfaces created would be modest with the parking and turning areas being constructed with permeable materials where suitable. Surface water drainage would be to a attenuation pond or 'swale' which is considered appropriate for the development.

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

Policy 38 Visitor Economy (Strategy Policy)

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

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

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

7.51 The application is considered to represent a 'package' of proposals which aims to significantly contribute to the visitor economy. All the different elements of the proposals would achieve this objective, in addition to providing new and improved facilities for the local community and wider area which is very popular for tourism. Whilst the proposals would result in the loss of the previous motel/hotel use this has previously been accepted by the Authority.

7.52 The policy allows for certain camping, caravan and chalet development together with visitor attractions, recreational and leisure activities. The application proposals include both these types of development, with the latter including an informal community garden and play area, but integral to the overall development concept.

7.53 It is suggested that the opportunity to stay in the proposed **mobile** holiday lodge units would meet the objective of Policy 38. In accordance with associated **Policy 41**, it can be seen this type of tourism accommodation development can be acceptable in countryside locations. The proposed bespoke units would provide a high standard of accommodation with some flexibility afforded to the internal bedroom layout and meets the definition of a caravan under the 1960 / 1968 Caravans Act. The proposed units would include modern levels of insulation with self-contained facilities.

7.54 It is noted that related **Policy 42** considers the provision of various ancillary facilities which are often associated with camping sites. Such facilities can include a camp shop, office, laundry facility and recreational options. No such facilities are to be provided within the site for

the proposed tourism development, thereby avoiding further built development and leaving more of the site as open space. The lodge units would be self-contained. However, occupiers of the tourism development would have the option of using the range of facilities on the other part of the development site.

7.55 The type of holiday accommodation proposed would attract visitors outside of the peak season whilst ensuring that the National Park environment is preserved and enhanced. The site is well-located with convenient access to various nearby tourist attractions and local beaches. Further justification for the development is set out in the submitted Business Plan (see **Appendix B**).

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.”

7.56 The above policy is a key consideration in the assessment of the proposal. The proposal would involve the provision of a new tourism expansion, in the form of holiday lodges (meeting the definition of a caravan). In our view, the development is in a discreet location away from the more open and prominent coastline and the Preseli's and would not be inter-visible with them.

7.57 Taking into account the points set out above, the site is not considered to be in a highly sensitive location but rather to be a modest well defined and partially screened site in an area characterised by existing built form that is not particularly visible or prominent in the wider landscape. The proposed site lies adjacent to a previously developed site which had a commercial use and which in overall, terms should be read within the context of the village settlement.

7.58 Whilst the site is situated in a landscape characterised by some long-established built form, cumulative impact is not considered to be significant in this case. There are few other tourist visitor sites in the immediate locality, noting the modest facility at Rainbolts Hill Farm. The proposal would not therefore have any cumulative impact on the character of the locality or wider National Park.

7.59 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 upon the setting of the locality.

7.60 The proposal delivers clear environmental improvements, in terms of ecological enhancement and reduced landscape impact. The proposed landscaping and planting is significant in extent and proportionate to the scale of development proposed. The proposed landscaping and additional native planting would help assimilate the development into its sensitive landscape setting.

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

7.62 Table 7 and related paragraphs refer to the different categories and scales of Caravan, Camping and Chalet development considered under the Landscape Capacity Assessment. In this instance, given the size of the site (1.59 ha) and the type of development proposed, the application falls into the category of:

“Static - Medium Static units including caravans, chalets and pods/hard structure glamping options on sites 0.5- 3.0Ha”

7.63 This application site falls within Landscape Character Area 12 which covers the ‘St. Brides Bay’ area and the Seascape character Area 21 ‘St. Brides Bay – Coastal Waters East.’ It is important to note at this point that the site is located towards the far eastern extent of the LCA the boundary of which is the A 487 and that of the National Park Authority area. In addition to the A 487 there is the settlement of Roch. The location of the site in relation to the LCA is indicated below:



Extract of LCA Map

7.64 The following is the Summary of sensitivity of LCA 12 – *‘The sensitivity of the area lies in the largely undeveloped indented coast especially to the north-west, coastal facing slopes, open skylines, scheduled monuments and their setting, nationally significant habitats along the coast and areas inter-visible with the sea and the Coast Path.’*

7.65 The document explains that development in the area is concentrated around Newgale beach to the north and around Broad Haven and Little Haven to the south, with some smaller sites inland or in discreet valley locations. Development outside the Park is visible on the skyline.

7.66 In terms of the Sensitivity Measures to the different types of development, whilst this is considered medium/high for large and medium static and large seasonal developments, it is considered *‘high/medium’* for medium static type developments which is proposed in this application.

7.67 The key sensitivities and characteristics which make the area of LCA 12 sensitive to development include the following bullet points

- *Largely undeveloped indented coastal edge and cliffs with semi-natural vegetation, especially to the north/north-west*
- *Medium scale landform, steep in places, sloping from up to 121m AOD towards the coast*
- *Primarily pastoral sloping landscape, with irregular small fields in places, which forms the backcloth to the coast, open in places*
- *Areas of hedge banks/low cut hedges or fences which tend to be more open to view*

- *The majority of the area is highly intervisible with St. Brides Bay with the exception of the southern-most area and to the north towards Brandy Brook*
- *Areas of skyline set back from the coast on gently undulating plateau top but also on top of cliffs in places*
- *Distinctive headlands/rocks at Dinas Fawr and Dinas Fach to the north and Ricketts Head*
- *Less developed and tranquil coast to the north, east of Newgale*
- *Key views from the coast path and from boat trips including from Solva*
- *The value of the area lies in its National Park status, historic features and the SSSI*

7.68 Given the location of the site away from the coast, many of the key sensitivities would not be affected by the proposal. For example, the site is away from the coastal cliffs and headlands and would not affect the SSSI or any historic sites or features.

7.69 There would be some views of the development from the Coast Path and in views across the open fields from the south-east. The site lies on rising ground. However, the proposal would represent a low-lying development in the landscape. Further, given that any potential views from the Coast Path would be from a considerable distance, the proposal is unlikely to appear visually intrusive, or to a degree that would have an adverse impact upon the character of the wider landscape.

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

'Summary of Capacity

The capacity for further development in the area is limited because some existing sites act as detractors visible from the sea and the Coast Path, and the openness of this area and the sloping land towards the coast means that further development along the coast and direct hinterland would adversely affect its character. There may be limited capacity back from the coast avoiding slopes and skylines.

Capacity for new Sites

There may be limited capacity for small static sites and small and medium seasonal sites back from the coast avoiding slopes and skylines and following the guidelines below.'

7.71 As the application involves the provision of a medium static site, there could be argued to be some minor conflict with the above guidance. However, one of the key factors in favour of the proposal is that it is not located in an open and remote location, but directly adjacent to other development on the edge of the National Park and a bespoke linked community development. The proposal would not involve the stationing of static or touring caravans which would have a far greater visual impact upon an area.

7.72 However, there is important Siting and Mitigation guidance specific to LCA which may relate not only to existing sites within the LCA but which may also relate to any proposals for

additional holiday accommodation covered by Policy 41. The proposal would comply with the guidelines for the following reasons:

- Whilst the development is sited on rising ground, it uses relatively flat land and set back from any slopes, away from the coast and avoids being 'skyline development.'
- The proposal extends into the edge of a field, the land take is relatively modest, and the proposed units are sited close to existing field boundary enclosing elements which are to be retained.
- The proposal would be sited adjacent to previously developed land which is to be redeveloped as a mixed-use development. The tourism development would therefore be sited '*adjacent to modern development*' as advised in the guidance, rather than a farm complex.
- The proposal avoids woodland and areas of nature conservation importance and historic features.
- The proposal would maintain, reinstate and enhance the field boundary pattern, including the incorporation of hedge banks as part of the landscaping scheme.
- There would be no new access required for this part of the development, with appropriate surface treatments and landscaping to assimilate the development into the landscape.
- Any external lighting would be kept to a minimum and where installed, the type of lighting would be downward fencing to minimise their impact.

7.73 It is therefore concluded that, whilst the proposed tourism development would lie within the LCA12, the document indicates that there is scope for some development where sited back from the more sensitive coastal area. The proposal should be viewed within the context of existing built development and given the siting and form of development proposal it can be satisfactorily accommodated within this sensitive landscape.

Policy 43 Employment Sites and Live/Work Units

Employment opportunities will be provided and safeguarded through:

- (a) Directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan's identified Centres or buildings suitable for conversion in the countryside (Policy 7d). Farm diversification can also assist (Policy 45);**
- (b) Allowing rural enterprises in the countryside where a need to locate in the 'countryside' location is demonstrated to be essential;**
- (c) Allowing extensions to established businesses and giving favourable consideration to new businesses aiming to join existing clusters in the countryside;**
- (d) Combining business uses with other uses such as community facilities or housing including live/work units.**

7.74 The supporting paragraphs explain that Pembrokeshire's economy reflects its rural location and whilst there are several large employers in the energy and service sectors, the County relies on small and medium-sized enterprises to drive its economy. It is also explained that '*...the strategy for employment generation is for small-scale provision in the Park to*

enhance the socio-economic well-being of the Park communities and also help tackle seasonality with employment in the area’ and that the general demand is for ready-built premises, rather than land.’

7.75 The proposal to provide three small business units would comply with the above policy. The site is located close to an existing Centre and which would form part of a ‘cluster’ with other compatible uses and community facilities. The location of the proposed would be located on previously developed land rather than in open countryside.

Policy 45 Farm Diversification

Permission will be given to farm diversification proposals where:

- a) **The scheme takes place on a working agricultural unit; and**
- b) **The proposal assists in sustaining the agricultural unit; and**
- c) **The proposal is compatible with its location; and**
- d) **The proposal is in harmony with and/or enhances the National Park landscape; and**
- e) **If a new building is justified, it should be sited in or adjacent to an existing group of buildings; and**
- f) **The vitality and viability of retailing and services of nearby Centres are not adversely affected; and**
- g) **Subject to there being no unacceptable adverse effects.**

Where such requirements are satisfied, the National Park Authority will use conditions attached to the planning permission or require the applicant to enter into a legal agreement to ensure that the diversification proposal is tied in perpetuity to the agricultural unit.

7.76 Supporting paragraph 4.236 is relevant in that it clarifies that *‘Broadening the economic base of farming activities is recognised as a means of improving the viability of the farm economy of the area.’*

7.77 Having regard to both local and national policy, there appears no dispute that tourism proposals qualify as a legitimate form of farm diversification. In the context of the criteria set out under **Policy 45**, Rainbolts Hill Farm is a working farm. As part of an approved application for the erection of 5 timber holiday lodges at this farm in March 2022 (reference NP/21/032) a useful background was provided to the operation of the farm. The Authority should refer to this information.

7.78 Rainbolts Hill Farm stands within 143 areas of farmland which was purchased by the current applicants in 2019. The applicants set up the farming enterprise in January 2020 under the trading name of ‘Pembrokeshire Agrisolutions Partnership’. The business is VAT registered. The land is currently under organic conversion and crops consist of arable silage, oats and permanent pasture, Permanent pasture is grazed with arable silage and oats stored for winter feeds. It is a traditional family run unit with a strong focus on regenerative farming practices, producing top quality food whilst protecting the landscape for future generations.

7.79 However, it was explained that a farm holding size of 143 acres was relatively small and income generated from primary farming activities is difficult to support a multi-generation family living off the farm. It also explains that building upon the success of the historic tourism related activities on the holding, an additional stream was required. The applicant is currently reviewing that permission, having regard to the possible outcome of the current application for an alternative tourism scheme on a different part of the farm holding.

7.80 The current proposals would still have a functional link with the Farm, in occupying part of its land and in the provision of a village shop as part of the redevelopment of the former motel site. The interconnections between the current proposals and the farm have been set out within the submitted Business Plan.

7.81 The proposal, with regards to its siting, scale, layout and form would be compatible with its location and as demonstrated earlier in this Statement, would be harmony with the National Park landscape. This has been set out elsewhere in this Statement.

7.82 Supporting paragraph 4.239 explains that in considering any diversification proposal, the authority will have regard to the effects of such proposals are likely to have on neighbouring amenity and the adequacy of the local road network. These issues have been dealt with elsewhere in this Statement.

7.83 Given the above considerations, the proposal is deemed to be a legitimate form of farm diversification and (subject to further assessment of the landscape impact above) to comply with the provisions of Policy 45.

Policy 54 Community Facilities

The provision and protection of community facilities will be achieved as follows:

- a) With new and extended facilities these will be permitted where they are well related to meet the community's needs and they are convenient to public transport, shops and other services where this is required to serve the needs of the user;**
- b) Development which would adversely affect the operation of a community facility, or results in its loss, will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable.**

Where considering a new use for a redundant community facility an employment use or affordable housing will be prioritised.

7.84 There is an existing village shop/fish and chip shop and post office located on the northern side of Church Road close to the main road junction. This shop closed about a year ago and has remained vacant ever since. This is known as Roch Gate Stores. It should be pointed out that although planning policies can seek to retain such facilities, they cannot require shops to reopen as this is quite often a commercial decision.



Existing and Closed Roch Gate Stores/Fish & Chip Shop - Church Road

7.85 Indeed, the closed premises has been marketed and there has been no interest shown and the building is in a poor state. This practice has been engaged to look at the demolition option of all buildings and three building plots and draft plans have been created and are shown below.



Draft plan of proposed demolition scheme and development of 3 plots on the site of the existing and closed Roch Gate Stores / Fish and Chip Shop – Church Road

7.86 The closure of the shop prompted the applicant to looking into providing a suitable replacement facility to serve the local community. Hence, the applicant has sought to offer a replacement and much improved facility as part of the current redevelopment proposals. The facility would be more modern with an enhanced range of services and goods on offer and operated on the basis of a village shop.

7.87 The proposed new facility would remain well located to serve the community's needs and would be accessible with the proposed highway improvements to be made as part of the redevelopment proposals. In addition, the other proposed community and recreational facilities would complement those which are already present in the village.

7.88 It is noted that a planning application for the redevelopment of the site for housing has recently been dismissed at appeal in August 2020. This outline application involved the erection of 5 dwellings together with one retail unit (including post office) following demolition of the existing buildings on site but have involved the loss of the restaurant/fish and chip shop element. The restaurant use had been vacant for several years. The application was rejected on several grounds – scale and cramped development; out of keeping with the street scene; lack of parking and highway safety; and that the applicant had not justified the loss of the restaurant use. Since this decision, the shop/post office has also closed.

7.89 This planning practice has been more recently instructed to submit an alternative proposal for this site. We believe that a new retail use of the site is unlikely to return in the future, citing viability questions.

7.90 **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.

7.91 Having regards to supporting paragraph 4.325, we do not believe that due to the historic use and the scale of development proposed that a Transport Assessment is required in this case.

7.92 The application proposals would involve the reuse and modification of the existing vehicular access onto the adjacent lane to the north, but with a new vehicular access being created onto the A 487 towards the south-eastern corner of the site. The proposals would operate a one-way system with entry from the north and exit to the south-east. Access to the adjacent tourism development would be via the main site. Other local road and pedestrian improvements are also proposed to provide improved linkages to the bus stops and the main village settlement. Some of these were included as part of the recently proposed housing redevelopment scheme and which were deemed to be acceptable to the County Highway Authority subject to conditions.

7.93 The proposal would involve the creation of a new vehicular access onto the A 487 which is shown to be provided with the required visibility sightlines. It should be noted that a similar point of vehicular access was found to be acceptable to serve the earlier approved hotel redevelopment scheme.

7.94 The site is ideally located in relation to the local road network and no environmental damage would be caused by the development. There would be some minor modifications made to the existing vehicular access onto the lane to the north, although there would be some localised impact resulting from the creation of the new vehicular access, onto the A 487, impacts would be localised.

7.95 It is suggested that the amount of additional traffic generated by the development can be satisfactorily accommodated onto the local highway network without harming highway safety. The site had a previous commercial use. Further, it is argued that significant improvements are proposed to pedestrian linkages between the site and the village settlement.

7.96 It is considered that suitable and adequate parking and servicing arrangements have been provided as part of the proposals, commensurate with the scale and type of development involved. However, in addition to seeking feedback from the County Highway Authority on highway safety issues, we would welcome feedback on the car parking and servicing arrangements proposed. In order to improve the sustainability credentials of the development, further consideration will be given to bicycle storage facilities around the site to serve the various aspects of the development.

7.97 In terms of accessibility, the following Officer comments made in respect of the previous housing redevelopment scheme are relevant, although the form of development involved would be different:

The site was not allocated in the LDP and compliance with the transport hierarchy has not therefore been considered during the Authority's planning making process and specific consideration is therefore required in the determination of the application. It is considered that the site is accessible to public transport and is close to the bus stop for the T11 bus which provides services between St David's and Haverfordwest. The application provides for the provision of a footway to the frontage of the site and this links into the footway to the bus stop and from this a crossing point on the A487 and to facilities available in Roch. Overall, there is considered to be reasonable compliance with the sustainable transport hierarchy, subject to appropriate conditions to secure the offsite footways.

7.98 Therefore, the proposal should be considered acceptable in highway safety terms, with the added benefit of significant improvements being made to local highway conditions and connectivity with the local village and public transport options.

8.0 NATIONAL POLICY ASSESSMENT

8.1 *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.

8.2 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.'

8.3 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 comply with this important concept and to be of a scale and design that respects the character of this acknowledged sensitive rural location. The proposal is also considered to generate the following positive outcomes:

- The proposal is a sustainable form of development, in that it partly relates to previously developed land and is located to close to an existing village settlement.
- Social and cultural well-being benefits, in that it would provide new community facilities which are lacking in the locality, including the re-provision of the local village shop/post office and which would help serve the local village and surrounding area. The proposed tourism development would offer more tourism opportunities for visitors to the area for which there is significant demand.
- There are a number of economic benefits, such as providing employment opportunities during and post construction, with many likely to go to local people, 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 siting, scale and design of the proposal would minimise its visual impact on the landscape character and amenities of the area. Appropriate conditions could be imposed by the Authority which would control and limit environmental impacts, such as noise and disturbance from activities associated with the development. 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.

8.4 Figure 4 sets out the Key Planning Principles which seeks to achieve ‘the right development in the right place.’ It states that in growing the economy in a sustainable manner, the planning system ‘...should enable development which contributes to the long-term economic well-being, making the best use of existing infrastructure and planning for new supporting infrastructure and services.’

8.4 On placemaking in rural areas, **paragraph 3.38** advises the following:

‘The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources. The need to conserve these attributes should be balanced against the economic, social and recreational needs of local communities and visitors. Fostering adaptability and resilience will be a key aim for rural places in the face of the considerable challenge of maintaining the vibrancy of communities and availability of services as well as contributing to the Cohesive Communities well-being goal.’

8.5 At paragraphs **3.39 and 3.40**, it recognises that for most rural areas the opportunities for reducing car travel and making use of other non-car modes are limited, and although most development should be located within settlements, it suggests there is scope outside settlements particular where functional linkages can be demonstrated. In this case, the development is located adjacent to an existing settlement and partly involves the redevelopment of a site that was previously in commercial use as a motel/hotel and as such, the proposal would have good functional linkages to this settlement and the wider area.

8.6 Paragraphs **3.55 to 3.56** deal with previously developed land. The following paragraphs are relevant and advise the following:

‘Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome. It is recognised, however, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated.’

Planning authorities should work with landowners to ensure that suitably located previously developed sites are brought forward for development and to secure a coherent approach to their development.'

8.7 In this case, the main site is entirely suited to the proposed development. The site is not in an unsustainable or 'remote' location and there are no physical constraints to its redevelopment, such as potential contamination. The development could therefore be brought forward in the short-term. The tourism element of the proposal is clearly more suited to a greenfield site.

8.8 Paragraphs **3.58** and **3.59** deal with the best and most versatile agricultural land. It advises the following:

'Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.'

8.9 Part of the development proposals involve some farmland which forms part of Rainbolts Hill Farm. We attach a letter dated February 2022 (see **Appendix E**) which confirms that that land at this farm is classified as Grade 3b or 4 and is therefore suitable for development. Further, it should be noted that the amount of land take would be modest, and which is located on the fringes of the farm holding.

8.9 Paragraph 3.60 deals with development in the countryside, and advises the following:

'Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing, or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.'

8.10 Having regard to the above, it is strongly argued that the location for the development is suitable and acceptable. In particular, although the site is located on the opposite side of the main road, it partly comprises previously developed land, it is physically and visually associated with the village settlement and the proposal would increase economic activity.

8.11 **Policy 56** of the Local Development Plan is a strategic policy relating to retail development in the National Park. This generally refers to the provision of new retail development in the main town and local centres in the hierarchy, rather than village settlements. The supporting text then refers the reader to relevant national policy which deals

more specifically with other aspects of retailing, such as farm shops, local shops, village shops and pubs which is considered more applicable in this case.

8.12 As the size of the proposed retail space proposed would be well below the quoted threshold of 2,500 sqm, a retail impact assessment should not be required in this case.

8.13 Paragraphs **4.4.30 to 4.3.42** specifically deal with local and village shops. This section advises that local and village shops, and public houses provide an important role in the local community and their loss can have a detrimental impact, particularly in rural locations. It also advises that local authorities should adopt a positive approach to the provision of new such facilities and that the lack of public transport in rural areas should not preclude small-scale retail or service development where this will serve local needs. It also advises the following:

‘Shops ancillary to other uses, such as farm shops that will help to meet the demand for fresh produce, craft shops and shops linked to petrol stations, can also serve a useful role in rural areas by providing new sources of jobs and services. In assessing such proposals, Planning Authorities should take account of:

- the potential impact on nearby retail and commercial centres or village shops;*
- the desirability of providing a service throughout the year; and*
- the likely impact of traffic generated and access and parking arrangements.’*

8.14 In this case, the proposals include the incorporation of a new village shop to serve the village and local community. The existing village is unlikely to reopen and is to be the subject of a planning application in the future for its redevelopment for a small-scale housing scheme. In our view, given the scale and nature of the proposal, it is unlikely to impact on other centres or other retail shops, any traffic associated with the use is unlikely to be significant, and the level of service is likely to be dictated by circumstances. The proposed drive-thru or takeaway facility would essentially be an ancillary function of the overall mixed-use of the site and would represent a small-scale use.

8.15 **Sections 4.5 and 4.6** specifically deal with community facilities and recreational space. The following paragraphs are felt to be relevant:

‘Community facilities perform various functions which cover a broad range of activities and services that can be delivered by the public, private and third sectors. Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places.’

‘Recreational spaces are vital for our health, well-being and amenity, and can contribute to an area’s green infrastructure. They provide a place for play, sport, healthy physical activity and a place to relax often in the presence of nature, and they contribute to our quality of life.’

8.16 One of the overall objectives of the scheme is to provide a facility which would be of value to the local community. In addition to the uses proposed in the main building, the scheme

includes the benefits of the community garden and formal play area which would be available to both local people and visitors alike.

8.17 **Chapter 5** deals with productive and enterprising places. It includes the development of land necessary for economic activity, including traditional office and industrial development, retail, rural enterprise and tourism. Paragraph 5.4.2 advises that *‘The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.’*

8.18 Paragraph 5.4.16 to 5.4.18 specifically relates to the concept of ‘business clusters’ which is considered highly relevant in this case.

‘Economic clustering typically occurs when businesses from the same or similar industry, or with a common interest, choose to locate in proximity for mutual benefit. Often, clustering concerns high technology, innovative or research and development-based companies, but may also include finance, food and media businesses, or supply industries serving larger manufacturers. Businesses can benefit from shared facilities, infrastructure, local pools of skilled and qualified labour, common supply chains and links to higher education.’

‘Planning authorities should also look favourably on any renewable and low carbon energy generation proposals designed to serve clusters, such as district heating systems and high efficiency energy recovery from waste, or the provision of an integrated network of waste recycling or collection.’

8.19 The proposals seek to create a business/community hub on the edge of the village of Roch, which includes various uses which would share a common interest and would benefit one another. It should be noted that the main site was previously in commercial use as a motel/hotel and this proposal seeks to replace that use with other commercial, retail and community type uses. Therefore, the proposal is consistent with the previous use of the site.

8.20 Sections 5.8 and 5.9 encourages sustainable building design and states that local authorities should facilitate all forms of renewable and low-carbon energy development. The proposals include the incorporation of solar panels and the applicant is currently investigating the incorporation of a biomass boiler facility as part of the development.

8.21 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”*.

8.22 **Section 5.6** deals with the rural economy. At paragraph 5.6.1 it 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". The section also advises the following:

'Planning authorities should plan positively to meet rural employment needs by identifying policies in their development plans. By supporting the development of a broad range of employment opportunities in rural areas planning authorities can increase economic prosperity and help address the effects of rural decline or depopulation where it occurs. Greater opportunity can support and strengthen the future well-being and sustainability of rural communities.'

Micro and small enterprises have a vital role to play in the rural economy and contribute to both local and national competitiveness and prosperity. While some employment can be created in rural locations by the re-use of existing buildings, new development will be required in many areas.

Proposals for diversification, new start-ups and micro-businesses should also be encouraged, where appropriate, to generate new job and wealth-creating opportunities.'

8.23 In addition to the retail and community uses proposed, the proposal includes the provision of three small business units. The proposed units are located on previously developed land and on a site, which lies close to a village settlement. This part of the proposals would therefore comply with these national policy objectives.

8.24 The above is considered to provide an assessment of the proposals against national policy as set out within PPW which is considered to have addressed the main issues. However, we refer briefly to certain TANs which may have some additional relevance to the proposals.

8.25 **TAN 4** recognises in national policy that urban and rural retail and commercial centres are the most suitable locations to live, work, shop, socialise and conduct business. Whilst it adopts a 'town centre first' approach it states that **TAN 6** provides further advice on planning for rural services and the economy which is felt to be more relevant to the current case. However, **TAN 4** in setting out a 'sequential test' in setting out the location of retail development, where 'out of centre' sites are concerned, preference should be given to brownfield sites which are or will be served by a choice of means of transport and are close to existing established centres. In this instance, the proposal relates to a rural village with no actual 'centre' and replaces a previous hotel/motel which had a commercial and in part, commercial/retail use, and is to replace a recently closed village shop/post office. It does not relate to a greenfield site and is, in effect a unique case.

8.26 **TAN 6** on the location of development, **Section 2.2** states the following:

'Many rural communities can accommodate development, particularly to meet local needs. New development can help to generate wealth to support local services, ensuring that communities are sustainable in the long term...In particular, planning authorities should

support developments that would help to achieve a better balance between housing and employment, encouraging people to live and work in the same locality.

Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car.'

8.27 **Section 3** deals with sustainable rural communities where the following paragraphs are relevant:

'Planning authorities should support the diversification of the rural economy as a way to provide local employment opportunities, increase local economic prosperity and minimise the need to travel for employment. The development plan should facilitate diversification of the rural economy by accommodating the needs of both traditional rural industries and new enterprises, whilst minimising impacts on the local community and the environment.

Development plans should identify a diverse range of sites suitable for future employment use. Where possible sites should be located within or adjacent to settlements.'

8.28 By proposing a mixed-use development and being located close to an existing settlement (and previously developed land) the proposals would comply with the above guidance.

8.29 **Section 3.8** specifically deals with farm shops, and states:

'Planning authorities, when considering planning applications for farm shops, should only limit the broad types of produce sold where an unrestricted retail use would result in a significant adverse effect on a village shop. Where there are no other shops in the locality, planning authorities should support a diversity of retail services, for example a sub post office, to help to meet essential needs of the community.'

8.30 In addition, **Section 5** deals with sustainable rural services, and states:

'To ensure that communities are sustainable in the long-term rural residents need to have reasonable access to essential local services.

Development plans should facilitate the provision of services as an essential part of new developments where they are of a sufficient scale...Outside identified service centres, planning authorities should support the provision of local facilities, especially where they would be of benefit to rural residents distant from existing facilities. Multi-purpose use may be an appropriate way to ensure service viability, particularly in more remote areas.

Planning authorities should adopt a positive approach to planning proposals designed to improve the viability, accessibility or community value of existing services and facilities, including village shops and post offices, rural petrol stations, village and church halls and rural public houses that play an important role in sustaining rural communities.'

8.30 The application proposals include the provision of a village/ shop / post office with the possible operational details being set out within the Business Plan. The proposal is intended to replace the existing village shop/post office which recently closed which would meet the essential needs of the community. The proposals would also provide a range of services in a mixed-use redevelopment for rural residents somewhat distant from existing facilities.

8.31 **TAN 12** deals with achieving good quality design in new developments, including the consideration of townscape and landscape contexts and various design and access principles. This issue is dealt with earlier in this Statement and in more detail a part of the separate Design and Access Statement (see **Appendix F**).

8.32 **TAN 13** deals with tourism. However, this advice note is now some 26 years old and could be argued to be out of date, particularly given the significant changes which have taken place in the tourism industry in more recent years. However, it does make reference to chalet type developments in addition to the more traditional types of holiday accommodation, such as static and touring caravans. However, paragraphs 4, 12 and 13 state:

‘Tourism comprises a range of different, but interdependent activities and operations which overlap with sport, entertainment, the arts and other recreation and leisure activities. It makes a major contribution to the Welsh economy, provides employment in a wide variety of occupations and can bring benefits to local economies and communities in urban and rural areas. It is subject to change in the type of holiday taken and the length of the holiday season.’

‘Holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation, while using less land for the purpose.’

‘The demand for sites has concentrated on the most popular holiday areas, particularly on the coast, although there is increasing demand inland. New and extended sites should be effectively screened and planned so as not to be visually intrusive.’

8.33 The proposals include the provision of tourism development on land adjacent to the main ‘The Gate’ redevelopment site. Careful attention has been given to the layout and design of the development, including the type of holiday accommodation to be provided. The proposal would be sympathetic to the location and with effective screening, it would not appear intrusive in the surrounding landscape, including in any possible views from the more sensitive coast.

8.34 The advice note also refers to the importance of hotels and guest houses to the local economy, and generally seeks their retention. However, as previously highlighted, the Authority has effectively accepted the loss of the previous hotel/motel use of the site.

8.35 **TAN 16** seeks to promote and encourage the provision of outdoor sport, recreation and open space, set within the wider national context of various strategies encouraging healthier lifestyles and social well-being, and that young people’s recreational needs are a priority. Although not related to a housing scheme and that there is not a specific policy requirement for such provision in this case, the applicant has included both informal and formal recreational

areas/facilities as part of the overall redevelopment proposals – a community garden and a LEAP for children. Both facilities are lacking in the village and. This should be viewed as a significant benefit of the proposals.

8.36 Paragraphs **3.13 to 3.19 and 4.11** relate specifically to planning for new open space and recreational provision. The paragraphs encourage the use of previously developed land, the provision of such facilities as part of mixed-use developments (which can also include entertainment, retail and leisure facilities) as regards better accessibility and that, in rural areas, they should be provided within or adjacent to settlements. The facilities would be suitably located and designed, safe and secure, and would be available and accessible to all, with active linkages being provided through local highway improvements.

8.37 **TAN 18** deals with achieving sustainable transport and other highway safety and car parking issues. **Section 2** deals with the integration between land use planning and transport, with three of the key policy objectives are to locate development to minimise the need to travel, to locate development near other related uses to encourage multi-purpose trips and managing car parking provision. The proposals would achieve these key objectives.

8.38 Paragraphs **3.10 and 3.11** deals with rural areas. This recognises that given the distinctive characteristics of rural areas, the car is important for accessibility in rural areas and this is likely to remain so for the foreseeable future. However, it also advises that:

‘Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas. Most development should be located in places accessible by a range of travel modes.’

8.39 **Sections 5 and 6** deal with the various design aspects of new development, including traffic management and catering for pedestrians and cyclists. The proposals include improvements to local road conditions and accessibility between the site and village settlement, and although would be some reliance on the private car, there are bus stops adjacent with services between Haverfordwest and St. David’s. One of key concepts of the proposals is to create a ‘business/community hub’ with multi-uses and is designed to minimise car use with local residents no longer having to travel to reach certain facilities and services elsewhere in the area.

8.40 The proposal is not expected to represent a major traffic generating development, or one which would require a detailed Transport Assessment. The amount of development would fall below the thresholds set out within Appendix D of TAN 18. It should be noted that the previous use of the site as a motel/hotel is likely to have generated a significant amount of traffic, with use being made of the existing access off the lane to the north.

8.41 **TAN 23** recognises that the planning system plays an important role is supporting the delivery of sustainable rural economies and business. This advice note provides clear support for the development, which seeks to provide a business/community hub, which would offer further economic advantages to the wider community both in terms of job creation and from

attracting more visitors to the area. The development is considered acceptable from an employment policy perspective.

8.42 It is therefore contended that the application proposals are strongly supported by the above national policies and advice. The proposals comprise a mixed business/community redevelopment of an existing site which previously had a commercial use, together with a modest tourism development as an adjunct to the main redevelopment. The proposal is supported by a Business Plan.

9.0 CONCLUSIONS

9.1 This major application presents an exciting opportunity to provide a high-quality mixed-used business/ community and tourism development centred on and around the former Motel /Restaurant site located on the edge of the village of Roch. This site has become a blight on the landscape and setting within the Pembrokeshire Coast National Park.

9.2 The proposed development comprises several different elements which together, as a package, are considered to achieve significant social, economic and environmental benefits to the local area and the wider Pembrokeshire community.

9.3 The site lies within a countryside location (in planning policy terms) although part of the site comprises previously developed land and is located adjacent to the village settlement of Roch. Whilst there may be some aspects of the proposed development which may conflict with planning policy, such as encroachment into the surrounding countryside, however, any conflicts are argued to be more than outweighed by the various benefits of the development.

9.4 The following factors are argued to be highly material considerations in the assessment of the proposed development:

- The main part of the site comprises previously developed land the development of which is strongly encouraged by national and local planning policy.
- The proposal comprises a mixed-use development, which includes community-related uses, and which again is strongly encouraged by national and local planning policy.
- The village has recently lost its shop/post office / fish and chip shop which has been a great loss to the local community. This development would reintroduce that valuable facility to the village as part of the development.
- The former Motel site has laid vacant and abandoned for some 15 years. It is in a poor and vandalised condition and significantly detracts from the character and appearance of this part of the village and wider landscape. The site needs to be put to beneficial use.
- The Authority has previously confirmed that the site is unlikely to return to a Motel/Hotel use.
- Whilst previous redevelopment schemes have been put forward for this site, these have not materialised. The applicant and new owner of the site is now putting forward a different proposition for the site, but in combination with a holiday lodge park on the adjacent farmland.

- The previously approved hotel redevelopment scheme granted permission in 2015 represented a significant scale of development on this site. The scale and visual impact of that scheme was deemed to be acceptable to the Authority. This current proposal would involve less built development (on the former Motel site) and would be far less imposing on the landscape.
- Careful attention has been given to the scale, layout, form, design and appearance of both main elements of the proposed development to ensure that it satisfactorily integrates into the site and its wider landscape setting.
- There is strong national and local policy support for new and high-quality tourism development, subject to scale, form and landscape capacity and visual impact considerations. There is clear capacity for new tourism development in this area of the National Park.
- The proposed tourism development is deemed to be suitably sited close to existing built development, including main village settlement, and to be well-conceived and anticipates an attractive layout and form of development that will grace rather than detract from the character and special qualities of this part of the National Park.
- The application submission includes a package of highway works, both to facilitate the proposed development but also to provide improvements to local connections between the site and village settlement.
- The application submission includes a robust and detailed planting and landscaping scheme to help integrate the development into the landscape, together with various biodiversity enhancements.
- The proposal would provide significant economic benefits, such as through the construction phase and the creation of new employment opportunities, with a focus on local people.
- In addition to providing a new village shop/post office to serve the village, the proposal also includes other community benefits such as the provision of an amenity area, a play facility and that a certain part of the building would be available to local groups and organisations.
- The proposal is considered to have high-sustainability credentials, which in addition to the regeneration of some vacant/abandoned land, it includes the incorporation of renewable energy options such as solar panels and the possibility of a biomass boiler.
- The application is accompanied by a full and comprehensive Business Plan which forms an important part of the submission.

9.5 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 any proposed highway works which arise out of the development.

9.6 The scheme is therefore considered to meet the overall strategic objectives of national and local planning policy. The proposal is considered to represent a high-quality and sustainable form of development. More specifically, the proposal is deemed to comply with **Policy 1** through the conservation and enhancement of its environment whilst simultaneously promoting its greater enjoyment, **Policy 14** which seeks to protect and conserve the environment of the National Park, **Policy 41** which seeks to regulate new development on

camping, caravan and chalet sites through measured and sensitive outcomes, **Policy 43** which seeks to accommodate new employment opportunities to appropriate locations, and **Policy 54** which seeks to accommodate new community facilities to appropriate locations.

9.7 This Statement is submitted to inform the pre-application discussion process. It seeks to provide full details of the proposed development and appropriate policy assessment. Given the importance of this site to the local community, we would welcome feedback from the Authority on the planning merits of the proposal, any issues of concern and if so, suggestions on how the scheme could be amended to address those concerns, and the responses of relevant consultees to inform the final scheme.

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

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

REPORT PREPARED BY
PAUL HARDWICK BSc (Hons) MRTPI
SENIOR PLANNER

REPORT PEER REVIEWED BY
ANDREW VAUGHAN-HARRIES BSC (HONS) Dip TP MRTPI
DIRECTOR / PRINCIPAL PLANNER



APPENDICES