
Ref No: NP/22/0635/FUL

Proposed Development: Proposed relinquishing of 50 mixed touring pitches (caravans and tents) in lieu of 36 high quality timber effect holiday lodges, an increase in the site area of the approved park, a new entrance, a new reception lodge, staff and visitor parking area, with extensive environmental improvements.

Site Location: Fishguard Bay Resort, Penrhyn Road, Dinas Cross, Fishguard, SA65 9ET

Applicant: Boutique Resorts Ltd

This application is being considered by the Development Management Committee as it relates to a proposal for major development.

Summary

The application proposes to relinquish 50 existing touring and tent pitches and to replace these with 36 timber lodges. An amended site layout including a physical extension of the existing campsite site to the west is proposed. A new entrance, reception lodge and parking area alongside additional environmental improvements is also proposed.

The existing site is on an extremely open and prominent area of the coast, situated in a countryside location between Fishguard and Dinas Cross. The proposal which would extend the physical area of the existing site westwards as well as infilling current seasonal pitches with a permanent lodge is considered likely to have significant visual impacts in a landscape identified as having medium/high sensitivity for such uses. The proposed intensification of use in a sensitive and open coastal location is contrary to the PCNPA LDP Policies in relation to Caravans and Campsites.

The proposed extension of the campsite to the west would involve the loss of Section 7 habitat (purple moor grass and rush pasture) which is contrary to the requirements of Planning Policy Wales 12. The layout and design of the site is not considered to deliver appropriate extended ecological enhancement and is contrary to the Authority's SPG on Camping and Caravan sites as it creates a rectilinear and more intensive design which does not seek to place seasonal and less visually intrusive pitches at the most open coastal parts of the site.

The proposed use of the site all year round would intensify noise and disturbance for neighbouring properties. Insufficient information in relation to both foul drainage and surface water drainage has been supplied and the Authority has not been able to conduct an assessment under the Habitat Regulations to assess potential impacts

on the Marine SAC. The Authority therefore cannot be certain that there would not be a likely significant effect on the West Wales Marine SAC under the Conservation of Habitats and Species Regulations 2017 and it does not have sufficient information to carry out the appropriate assessment required.

Whilst the potential economic benefits of the proposal are recognised, these are not sufficient to overcome the concerns identified in relation to the principle of development, visual impacts, biodiversity and potential environmental impacts and potential amenity impacts. The proposal is considered contrary to the relevant policies of the PCNPA LDP2 and also to Planning Policy Wales Edition 12 and is therefore recommended for refusal.

The application plans and full details can be found on the PCNPA website at: [PCNPA Planning \(pembrokeshirecoast.wales\)](http://PCNPA.Planning(pembrokeshirecoast.wales))

Consultee Response

Natural Resources Wales	Concern – further information required (29th November) – Concern and further information required (4th Dec 2023)
PCNPA Tree and Landscape Officer	Conditional Consent
National Trust	Objecting
PCC Highways	Conditional Consent
Dwr Cymru/Welsh Water	Conditional Consent
PCC Access Officer	Informative
PCNPA Strategic Policy	Objecting
PCC Drainage Engineers	Conditional Consent
PCNPA Ecologist	Objecting
PCNPA Access Manager	Conditional Consent
Dinas Cross Community Council	No response
South Wales Trunk Road Agency	Objecting

Public Response

A site notice, neighbour notification letters and newspaper advert were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Thirteen third party responses have been received from twelve individuals. These have raised a range of concerns including:

- Loss of green space and loss of coastal habitat
- Concern regarding loss of touring and tent pitches impacting on tourism offer
- Proposal is overbearing in nature
- Loss of trees
- Loss of ecological habitat
- Impact of design - lodges very large in scale
- Layout and density of buildings
- Access and highways safety
- Traffic generation

- Noise and disturbance from proposed development
- Risk of precedent
- Biodiversity impacts - clearance has already taken place on site.
- Triangular field for expansion is a valuable meadow for wildlife
- Expansion of site area will have visual impact and cause visual intrusion on surrounding area and along the coast path.
- Light pollution and potential impact on dark skies at night.
- Noise pollution will increase - already significant from hot tubs at night.
- Hot tubs being tipped onto grass with chemicals present
- New lodges being proposed will be on grassland areas which have never before had tents or caravans previously sited
- Concern that the development will detract from other holiday accommodation in area
- Overcommercialisation of area
- Concern increased development will prevent wildlife navigating.
- Concern regarding potential planning breaches on application site
- Misleading images in planning application used
- Removal of white caravans as claimed by application is not a genuine benefit as only 5 caravans remain on site, remainder are lodges
- Removal of multicolour awnings as claimed by application is not a genuine benefit as no awnings permitted on site.

One response expressed support for the proposal.

Where material these issues are addressed in the main body of the report.

Policies Considered

Planning applications need to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. The development plan comprises two documents, namely:

Future Wales, The National Plan 2040 (Future Wales), published by Welsh Government on 24 February 2021. On page 149, it states that “Policies 4 and 5 will help to ensure that rural areas in the Southwest grow in an appropriate way, supporting rural economies and services.” On page 104, Future Wales states that “National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...” and that “Future Wales policies respect the functions of National Parks in terms of their statutory purposes...”

The Local Development Plan (LDP2)

Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website –

LDP2 Policies –

Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website –
Local Development Plan 2 - Pembrokeshire Coast National Park

LDP2 Policy 01 - National Park Purposes and Duty
LDP2 Policy 07 – Countryside
LDP2 Policy 08 - Special Qualities (Strategy Policy)
LDP2 Policy 10 – Sites and Species of European Importance
LDP2 Policy 11 – Nationally Protected Sites and Species
LDP2 Policy 14 – Conservation of the Pembrokeshire Coast National Park
LDP2 Policy 20 – Scale of Growth (Strategy Policy)
LDP2 Policy 29 – Sustainable Design (Strategy Policy)
LDP2 Policy 30 - Amenity
LDP2 Policy 32 - Surface Water Drainage
LDP2 Policy 38 - Visitor Economy (Strategy Policy)
LDP2 Policy 41 - Caravan, Camping and Chalet Development
LDP2 Policy 42 - Site Facilities on Tent, Chalet and Caravan Sites
LDP2 Policy 43 – Employment Sites and Live/Work Units (Strategy Policy)

Future Wales - The National Plan 2040 (FW which was adopted on 24th February 2022)

Planning Policy Wales 12

PCNPA SPG – Caravan and Camping
PCNPA SPG – Landscape Character

Technical Advice Note’ – TAN 13 Tourism

Officer’s Appraisal

Background and History

Fishguard Bay Resort is an existing caravan and tent site with use as a holiday park established in the mid-1950s. It has planning permission for a total of 100 holiday units, comprising 50 static caravans and 50 touring caravans and tented camping pitches over an area of approximately 2.8ha.

The existing holiday park is located in a countryside location and sits on a prominent site on the Pembrokeshire coast approximately 1km from the A487 with the junction 2.5km to the east of Fishguard and 3.5km to the west of Dinas Cross. To the North of the site is the open coast and cliffs, to the southeast there are four domestic properties with open fields to the South West and the access road for the site.

Relevant Planning History

NP/11/333 -Patio's & decking to caravans & replacement of existing shed - approved 13th October 2011

NP/17/0699/FUL - Alterations to provide new access to the site, increase site area & change all existing static caravans & touring caravans/tents to lodge style static caravans, new tennis court, new shop & reception area, new tractor shed, staff &

visitor parking areas, new restaurant, minor alterations to existing road layout & detailed ecological enhancement & mitigation - Withdrawn 28 March 2018

NP/18/0335/FUL - Alterations to provide new access to the site, increase site area & change existing 50 static caravans, 20 touring caravans and 30 tents into 91 lodge-style static caravans, new shop & reception area, new tractor shed, sales/display area for 2 units, staff & visitor parking area, new restaurant, areas for LPG storage and electricity transformer, minor alterations to existing road layout together with provision of new access roads within the site and associated external works - Refused 06 March 2019

NP/02/476 - Redevelop existing main amenity building - approved 02 Jan 2003
NP/284/89 (D2/89/633) – New roof and improvements to bungalow – Approved 24/7/89

NP/637/88 (D2/88/1522) – Change of use of toilet and stores to residential chalet – Refused 27/1/89

NP/473/86 (D2/86/930) – Double garage extension to bungalow – Approved 25/11/86

NP/336/86 (D2/86/580) – Sun lounge extension – Approved 25/9/86 NP/313/86

(D2/86/581) – Tea room – Approved 29/7/86 NP/493/84

(D2/84/1090) Extension to period of caravan occupancy – Approved 28/12/84
condition no 2 on Planning consent HR/1772/60/620 deleted and replaced with "This consent shall not authorise the site for occupancy of caravans during the period 10th January to 28th February in any year."

NP/490/83 (D2/83/1022) – Additional 20 Touring Caravan pitches – Refused 13/1/84 – Appeal Allowed 26/9/84 Condition 3 notes that the 20 touring pitches hereby permitted shall be in addition to the 50 caravans and 30 tents for which consent already exists.

NP/145/83 (D2/83/274) – Additional 20 Caravan pitches – Refused 27/4/83 – Appeal Lodged 22/9/83 appeal withdrawn 22.2.84

NP/657/79 (D2/79/1366) – Additional 20 Tourers – Refused 20/12/79

NP/440/77 (D2/77/820) – Use of building as septic tank – Approved 29/9/77

HR/1772/60/620/1 - Field for 20 tents permitted 21 May 1965

HR/1772/60/620 - Permission as caravan site (for 50 tourers 1st April - 6th October each year) approved 10/10/1960 for a 10 year period from 1962-1972. Note on file for NP/145/83 that the consents were made permanent in 1965.

Current Proposal

The proposal involves relinquishing 50 tourer/tent pitches with the provision instead of 36 lodges. The current planning history permits 30 tents and 20 touring pitches. The 13 lodges would be placed in the existing site area. A further 23 would be placed to the west of the existing site as part of a physical extension of the existing caravan and tent site. An attenuation pond is proposed at one of the lowest points on the site at the north, below the extension area.

A new reception lodge and access track is proposed as well as a re-routing of the coastal path.

Some limited new planting is proposed within the existing physical area of the caravan and tent site, with more comprehensive planting proposed around the extension area to the west. A bracken management scheme and area is proposed further west beyond the siting of the extended area for the new lodges.

The planning statement clarifies that if approved the 36 holiday lodges would be for unrestricted holiday use only and that the lodges would be subject to a 12-month holiday season in order to compete with other holiday parks throughout the UK.

The application proposes a mix of single and twin unit holiday lodges. The twin unit lodges measure 14m x 6.7m and the single unit lodges measure 14m x 4.5m. The proposed reception area is a twin unit lodge measuring 14m x 6.7m.

Key Issues

The application raises the following planning matters:-

- Acceptability of the principle of development and impact on National Park Landscape and Special Qualities
- Whether an appropriate design is achieved in accordance with policies
- Whether transportation matters are appropriately addressed
- Whether there is an adverse effect on amenity
- Whether nature conservation interests are satisfactorily protected and if biodiversity enhancements are achieved
- Whether water and drainage impacts are adequately addressed

Policy, Principle of Development, and Impact on National Park Landscape and Special Qualities

Future Wales - the National Plan 2040 (FW) is the national development framework for Wales - it is the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) and Policy 5 (Supporting the Rural Economy) are intended to inform policies in Strategic and Local Development Plans.

Planning Policy Wales Edition 12 paragraph 5.5.3 notes that "In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are

appropriate. Development should be sympathetic in nature and scale to the local environment."

Policy 01 (National Park Purposes and Duty) of the Pembrokeshire Coast National Park Local Development Plan (LDP) sets out the National Park's purposes and duty, to ensure that development is compatible with these. The supporting text notes that these purposes are underpinned by the Sandford Principle which asserts the primacy of the first purpose (conservation and enhancement) over the second (public understanding and enjoyment) in cases of obvious conflict.

The application site is outside any Centre boundary and is therefore in a countryside location. Policy 7 Countryside notes that development outside identified Centres must be strictly controlled. Development which is acceptable in principle includes tourist attractions or recreational activity where the need to locate in the countryside is essential, Policy 7 cross references Policy 43 and Policy 28 Visitor Economy.

The caravan site is an established business - Policy 43 supports extensions to established businesses in order to provide and safeguard employment opportunities. The proposal is to add 36 lodges in part through a physical extension to the west of the site, in lieu of 50 pitches permitted as touring and tent pitches. Policy 38 (Visitor Economy) seeks to ensure that the National Park environment is conserved and enhanced by allowing limited caravan, camping and chalet development.

Policy 41 Caravan, Camping and Chalet Development provides detailed criteria that will be used to assess proposals. Three types of proposals are considered acceptable:

- "New caravan, camping and chalet sites and changes of pitch types within existing sites will be considered away from the coast and Preselis and in locations not intervisible with them.
- Extensions to existing sites will be considered where the extension is in a well-screened location.
- Extensions to existing sites with no increase in pitch numbers to achieve clear environmental 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 discrete locations."

Fishguard Bay resort is an existing site.

The proposal is to add 36 lodges onto the site, including to an area which has not historically been used by tents or caravans. The proposal is to relinquish 50 touring/tent pitches as part of the development. For clarity - the planning history on site permits 30 tents and 20 tourers as well as 50 static caravans.

The acceptability of the proposal thus depends on whether either the extension is in a well screened area, or whether the scheme is allowing pitches to be transferred to

more discrete locations as well as delivering clear environmental improvements in relation to landscaping and layout.

Paragraph 4.213 of the reasoned justification supporting Policy 41 states:

"Opportunities for new sites and extensions to existing sites are generally small-scale, catering for seasonal touring caravan or camping pitches. There may be a very small number of opportunities for medium scale proposals. Opportunities for new large-scale static sites were not found."

Table 7 of the LDP2 classifies static medium sites as being proposals for static units including caravans, chalets and pods/hard structure glamping options on a site area which is greater than 0.5ha and a maximum of 3ha in size. Large static sites are sites including caravans, chalets and pods/hard structure glamping options on a site above 3ha.

As confirmed in the planning statement the planning application site amounts to approximately 5.1ha. The existing area of Fishguard Bay Resort itself extends to approximately 2.8ha. The application proposes an extension to the resort of approximately 2.3ha onto land immediately adjoining the western boundary for the siting of 23 lodges as well as the new entrance, reception lodge and car park. The applicant has also included a further area of land to the west of the park for ecological enhancement.

The scheme as a whole is therefore considered to constitute a medium scale extension to an overall large-scale static site.

The site when considered as a whole would constitute a large-scale static site.

The Authority's Landscape Character Area Supplementary Planning Guidance document identifies this site as falling within the Dinas Head Landscape Area (LCA 24). The SPG describes some of the Special Qualities in this LCA as being linked to the distinctive sense of place derived from the extensive coastal views across Newport Bay and Fishguard Bay, with the high prominent headland of Dinas Head providing a strong focal point and visual reference.

The Authority's Caravan, Camping and Chalet Supplementary Planning Guidance (SPG) document (adopted in May 2021) identifies the sensitivity of different landscape character areas for caravan, camping and chalet proposals and provides information on whether or not there is landscape capacity for additional development of pitches.

LCA 24 is identified as having a High/medium sensitivity to medium static proposals. It is considered to have limited capacity for further developments/units. The SPG notes that "The area has limited capacity because further development in more open or exposed sites would affect the mainly unspoilt and undeveloped character of the coast with the potential for views from Newport Bay and Fishguard Bay." In relation to capacity for extensions to existing sites to increase accommodation it states:

"There may be very limited opportunities for extensions for inland sites where there are existing woodland, trees and hedges to screen the extensions but not those on the coast."

With regards to capacity for extensions to existing sites (to improve sites without increase in accommodation) the guidance notes "There are no situations where there may be a benefit in extending sites without an increase in accommodation."

The proposal in this case to intensify the existing site and extend the area of the site in a location on the coast is contrary to the guidance set out in the Authority's adopted SPG on Caravan, Camping and Chalet. Detailed design and mitigation guidance relating to siting is considered below under design.

In considering the proposal, Officers are of the view that the site as a whole is extremely prominent within the wider landscape, the existing caravans are clearly visible along the coast path to both the east and west, in wider views from Fishguard Bay and to all of those travelling on the Irish ferry from Fishguard. The extension area proposed is also within an area which is extremely prominent and visible within the wider landscape.

Natural Resources Wales have commented in their pre-application advice that "*we do not consider replacement of the existing triangular camping field (28 days permitted development) with static lodges represents an enhancement. This would be an adverse impact.*" They have reiterated this comment in relation to the planning application. They note that whilst some improvements have been made in the scheme since the pre-application stage – there still appear to be at least 10 new lodges proposed on the cliff edge which would be a visual detraction as well as 23 new lodges in the triangular field.

Policy 41 is supportive only where the proposal does not result in a net gain of pitches and results in a clear environmental improvement.

Whilst no net gain in pitches is proposed, the proposal does represent a significant intensification of the existing site. This intensification is both as a result of the proposal to fill in gaps which are used currently on a touring and seasonal basis with permanent lodges and because of the move from 30 tents to static caravans and 20 touring caravans to static caravans/chalets. The intensification in use will also be amplified by the proposed physical extension of the area of the existing site.

The landscape sensitivity of the area in which the proposal is medium/high for this type of use and Officers consider that the proposal in conjunction with the prominence of the wider existing site would result in a significant detrimental visual impact to the National Park.

Policy 1 National Park Purposes and Duty notes that development in the National Park must be compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and the public understanding and enjoyment of the special qualities by the public.

The Sandford Principle asserts the primacy of the first purpose over the second in cases of irreconcilable conflict and given the particular sensitivities of the landscape in this case to static caravan sites, Officers consider that development here would not be compatible with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park and that that takes primacy over any tourism benefits of the proposal.

Policy 8 Special Qualities criterion c requires that the pattern and diversity of the landscape is protected and where possible enhanced. Policy 14 (Conservation and enhancement of the National Park) seeks to prevent development which would cause visual intrusion and or would introduce or intensify a use which is incompatible with its location.

In intensifying a large static site on the cliff edges of a medium/high sensitive landscape the proposal will impact negatively on the extensive coastal views which are identified as contributing to the Special Qualities of the National Park in this location.

Officers of the Authority therefore consider that the proposal is not acceptable and does not comply with Policies 1, 7, 8, 14, 38 and 41 of LDP 2. The proposal is unacceptable in principle when assessed against the key relevant strategic policies of the LDP2. The proposal will have a significant detrimental impact on the special qualities of the National Park by intensifying the visual impact and intrusion of a large static caravan site within the extensive coastal views of this section of the National Park.

Siting and Sustainable Design

Policy 29 Sustainable Design supports proposals which are well designed in terms of a range of criteria including place and local distinctiveness, environment and biodiversity and materials and resources.

The proposed design is a high-density design which seeks to intensify the occupation of the existing area of the site and add a further physical extension of the site to the west.

With regards to design of camping and caravan sites, the Authority's SPG on Caravan and Camping suggests a range of specific siting guidance for each Landscape Character Area. This siting guidance for LCA 24 suggests siting units close to the edges of enclosing elements such as field boundaries or woodland rather than in the middle of fields or spaces. It also seeks to avoid siting in areas with key views such as to and from the sea, from the Pembrokeshire Coast Path and from sensitive areas of designated open access land. Mitigation guidance suggest reducing the density of static caravan development creating green space with native tree planting between caravans. It also suggests static unit layouts which are less rectilinear with curving access roads and spaces. In more prominent locations/fields the guidance suggests removing static units and using the space for amenity and considering lower impact units such as seasonal tents, yurts or safari tents. In prominent locations directly by the coast the SPG suggests removing statics.

The proposal made by the applicant is an increased density of static caravans (lodges) in a site immediately adjacent to the coast which is directly crossed by the Pembrokeshire Coast Path. The siting of the lodges on the current site is rectilinear - the proposal is to intensify this filling in gaps with permanent lodges which are currently used by tents and tourers on a seasonal basis. The extension area proposed also involves rectilinear siting with little open space between lodges. The landscaping proposed to the existing site is minimal and the greatest landscaping proposed is to the west of the site extension. No screening would assist views from those on the ferry or from the coast path as it crosses the site. The intensification of the density of the existing site and the development of the prominent area to the west with a high density, rectilinear plan would result in significant visual intrusion in this sensitive coastal location.

The static caravans proposed are permanent in nature and would be on site all year round adding to the visual intrusion. This visual intrusion in impacting on the Special Qualities of the location associated with its extensive open coastal nature is not considered to contribute to place or local distinctiveness.

The scale of the twin unit lodges which are proposed as part of the application are also considered overly dominant in mass for this sensitive location.

Whilst the biodiversity elements of the proposal are assessed in greater detail below, in terms of design – the proposed layout which ‘infills’ the current green spaces currently used by touring caravans and tents within the existing site and focuses biodiversity and green spaces to the edges of the site and west of the site only rather than ensuring connectivity opportunities throughout the site is not considered to be well designed in terms of the environment.

The applicants planning statement highlights that a key benefit of the proposed application is the removal of white caravans, touring caravans and tents from the headland and their replacement with muted lodges. The applicants note that they believe the touring caravans can remain sited all year with no limitation on occupancy. A number of objectors have disputed this claim, noting that the existing static caravans have already in the majority been replaced by brown chalets, with only approximately 5 white permanent statics remaining on site – this view is shared by Officers following site visits.

With regards to tents – the Authority SPG states explicitly that there is a preference for lower density use closer to the coastline and therefore this change from 30 tents to lodges is not viewed by Officers as a potential benefit in terms of landscape impact. The permission (D2/84/1090) ‘extension to period of caravan occupancy’ identified in the planning history does also place a limit on the occupancy of all caravans on site with occupancy prevented between 10th January to 28th February in any year. The applicants also state that lodges can at present be sited in any location on the site. This is also disputed by the Authority as the permission granted on appeal NP/490/83 (D2/83/1022) – Additional 20 Touring Caravan pitches – Refused 13/1/84 – Appeal Allowed 26/9/84 includes controls relating to layout in the conditions to be agreed with the LPA, and this layout was subsequently agreed.

Policy 9 Light Pollution advises that proposals will be permitted where there is no unacceptable adverse effect on the character of the area. In extending the physical area of the caravan site a number of third parties have highlighted concerns regarding potential negative impacts on dark skies in this location. No lighting scheme has been supplied with the application. The potential expansion into this location of the caravan site is however considered by Officers to be likely to increase light pollution and therefore conflicts with Policy 9 Light Pollution.

The design does not therefore reflect guidance within the Authority's Camping and Caravan Capacity SPG and is considered unacceptable and contrary to Policy 29 of the PCNPA LDP2. The extension into the area west of the current caravan site is also considered likely to have an unacceptable impact on light pollution, contrary to the requirements of Policy 9 of the PCNPA LDP2.

Amenity and Privacy

LDP Policy 30 Amenity seeks to prevent any development which would have an unacceptable effect on amenity including development which would lead to an increase in traffic or noise or odour or light.

A number of third-party representations have raised concerns regarding potential additional noise and disturbance if an increase in static caravans/chalets is permitted on site. They have cited in particular the disturbance associated with the current use of hot tubs on the site in the evening.

Concerns regarding increased traffic movements given the proposed use of the whole site on a 12-month basis compared to the current more seasonal patterns of use have also been raised by third parties.

Whilst there is a significant physical separation from the area proposed as an extension to the west of the site from residential properties – the access proposed will serve the whole site. It is anticipated that there would be an increased level of noise and disturbance associated with the intensification of the sites use to 12 months of the year for the lodges despite the slight overall reduction in pitches, because of the more formalised nature of the accommodation proposed.

The proposal is therefore considered likely to have an unacceptable impact on neighbouring residential amenity through increased noise and traffic movements. This is contrary to the requirements of LDP Policy 30 Amenity.

Access and Parking

Policy 59 (Sustainable Transport) seeks to permit development which promotes sustainable travel choices and reduces the need to travel by car by ensuring new development is well designed and provides appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate and not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated.

Policy 60 (Impacts of Traffic) prevents development where appropriate access cannot be achieved; where traffic would generate an unacceptable adverse effect in terms of congestion, times of generation or where there is an unacceptable adverse effect on road safety.

The Highways Authority have been consulted. They have responded as follows:

“There is no highways objection to the principle of the new entrance, internal infrastructure or buildings proposed. The application includes proposed new parking facilities near the reception lodge for 40 vehicles and 1 disabled space. This should strictly be 6% disabled parking area for the whole site. For this new area this would equate to 3 spaces, an additional two disabled spaces will need to be added.

There is concern about the condition of the Unclassified Road (U3425 Penrhyn Road) leading to the site. The site entrance is 1km from the junction with the Trunk Road A487. The unclassified road shows deterioration of the surfacing of the verges, and also to the edges of the carriageway, where vehicles pass one another. There is a need to upgrade informal rough stone and muddy passing areas before any part of the new development is open for business. In addition, the condition to the road surface has been raised in previous planning application (NP/335/18) and pre-application (PE-2390) pertaining to this site. It is not just the need to follow a Road Condition Survey, as one of the recommended conditions suggests, where the cost of damage which can be specifically attributed to the construction period for the new buildings (including demolishing and removing old buildings) and landscaping, can be claimed for, but due to the future traffic increase then there needs to be work done to upgrade the surfacing on the passing places. There will be a significant number of heavy goods vehicles bringing in lodges during the early months and years of operation. In addition, the number of movements along the U3425 is likely to increase due to turnover of the holiday accommodation. The Applicant, is therefore advised, to enter into a S278 Agreement with the County in order to undertake the construction of the passing bays.”

The Highways Authority have identified three planning conditions that would be required to make the proposal acceptable in highways terms and applied in the event that permission were to be granted. These include a Grampian condition requiring the creation of passing bays. Other conditions would require the provision of a Construction Traffic Management Plan and detail of disabled parking facilities.

The Trunk Roads Agency has also been consulted and have advised that they do not consider that planning permission should be granted at this time as they consider further information is required. They consider that the applicant should confirm the mode of site delivery for the lodges and details of any proposed Traffic Management necessary to accommodate this. Whilst the Trunk Road Agency have suggested that permission should not be granted – it would be possible to adequately control the information required through a planning condition and this is not therefore considered a reason for refusal.

The proposed development would affect a public right of way, public footpath PP20/32, which forms part of the Pembrokeshire Coast Path National Trail (part of the Wales Coast Path). The PCNPA Access Manager has been consulted and has

advised that “The applicant’s proposal to divert the Coast Path (depicted in blue dots on Plan SK02) is welcomed in principle but the proposed route runs along a set of steps and across a parking area to the north of the communal building where it is likely to be encroached upon and blocked by parked motor vehicles. The most appropriate route for a diversion of the Coast Path in the circumstances would be that of the route currently managed and signposted by the National Park Authority.

If the National Park Authority is minded to approve the planning application, it is necessary for the public right of way to be diverted to accommodate the proposed development, along the route shown on plan 2 attached. The applicant would therefore have to apply for a Public Path Diversion Order prior to the commencement of any approved work on the line of the public footpath. Any grant of planning permission must be therefore be conditional on the following terms in respect of the affected public right of way.”

Officers consider that it would be possible to ensure that access and highway aspects were suitably addressed through planning conditions. Therefore, subject to recommended conditions the application is considered appropriate in terms of highways and access and, is therefore considered to comply with Policies 59 & 60 of the Pembrokeshire Coast National Park Local Development Plan. This is not however considered to outweigh the other policy reasons for refusal identified elsewhere in this report.

Landscaping

Natural Resources Wales have raised concerns regarding the planting proposals made by the applicant, noting that the proposed planting of advanced nursery stock is unlikely to do well on this exposed coastal promontory. They have also raised concerns about species included on the Revised Masterplan noting some of the species are not appropriate for the locale. Their response states that it is unclear if hedgebanks are proposed anywhere other than the entrance and that ‘windproof fencing; on either sides of the new hedges is unlikely to be successful.’ Their response notes that there is no tree survey for the site and that the PEA covers only the extension of the development.

As set out in the Design section it is considered that the focus on introducing landscaping to the west of the site and the perimeter of the site only is a very limited approach which does not explore benefits of connecting landscaping measures throughout the site.

As currently proposed it is not considered that there is sufficient information to support the benefits of landscaping screening measures stated by the applicant because of uncertainty that the proposed measures would be delivered in this location given the concerns regarding species, nursery stock elements and a lack of widespread hedgebank elements in the site. This, as identified above, is contrary to the requirements of LDP Sustainable Design policy 29.

Biodiversity

Planning Policy Wales 12 PPW, TAN5 and LDP Policy 11 requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat. A Preliminary Ecological Appraisal was submitted with the application dates October 2022. The bat surveys undertaken in 2021 in support of the application confirmed that buildings on site hold negligible potential for roosting bats and all of the buildings are to remain intact and unaffected as part of the planning application. Further survey work in 2021 identified a low population of slow worms, grass snake and adder at the site. No impacts on protected species are anticipated from the development. 18 bird species were recorded on site and a mitigation strategy has been produced to ensure protection of nesting birds during construction.

In order to comply with Planning Policy Wales 12 (February 2024) and the Environment (Wales) Act 2016, planning authorities are expected to ensure every development both maintains and enhances biodiversity. Planning Policy Wales 12 states that Planning Authorities must follow a step-wise approach to maintain and enhance biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated and as a last resource compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site, or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

Developers have been expected to provide evidence in a Green Infrastructure Statement that a step-wise approach has been followed and a scheme of enhancements must be provided to ensure a net benefit for biodiversity, which was introduced by PPW12, after this application was received. No Green Infrastructure Statement has been supplied to support the planning application however an ecological mitigation and enhancement strategy has been supplied with the application. This strategy provides a construction method statement and compensation and enhancement measures for bats, birds, reptiles, amphibians and dormice and habitat compensation and enhancement. This statement notes that “Although the plans will see the loss of a proportion of the existing area of Rhos pasture in order to facilitate the proposals, the development will seek to maximise the retained area through the implementation of a sensitive management regime which will aim to restore and enhance the degrading habitat and bring it into ‘good condition’. In addition the development will be seeking to implement a management regime for the area of dense bracken to the west of the site and neutral grassland to the north of the site. The DEFRA Biodiversity Net Gain calculator has been provided to evidence that the proposed development can achieve a ‘measurable net gain’ in biodiversity.

In response to the information provided, the PCNPA Ecologist has advised that *“the UK habitats classification survey plan in Section 4.2.2 of the ecological report shows field 3 to be mostly Purple moor grass and rush pasture with areas of mixed scrub. It is acknowledged within the report that the area is unmanaged and therefore degraded. However, Purple moor grass and rush pasture is a Section 7 habitat of*

principle importance under the Environment (Wales) Act 2016. Although the proposed site plan allows for a small area to be managed and retained appropriately a majority of the area will be lost to the development. As the seed bank is there and the habitat could be made good following relatively low level of management, the Section 7 habitat could be considered irreplaceable under PPW and so must be retained. It is therefore recommended that the extension of the caravan site is limited to the northern field classified as 'other grassland' and has been described in the ecological report as not qualifying as a Section 7 habitat."

She has further noted that insufficient information on tree loss has been supplied with the information but that the proposed bracken management is welcomed. She notes that a gap is proposed in the proposed ecological enhancement area and existing vegetation along the cliff top, which is broken up by three lodges. To ensure continuation of ecological features I recommend that the three lodges are replaced by an extended ecological enhancement area.

The PCNPA Ecologist has advised therefore that at present the site layout is unacceptable and would need to be adjusted to accommodate biodiversity so as to ensure compliance with PPW and the Environment (Wales) Act.

The location of the application site is in close proximity to the West Wales Marine / Gorllewin Cymru Forol Special Area of Conservation (SAC). As set out below limited information in relation to foul drainage has been supplied which is necessary in order for the Local Planning Authority to be able to carry out a Habitat Regulations Assessment under regulation 63 of the Conservation of Habitats and Species Regulations 2017. As such the local Planning Authority cannot at this stage rule out a likely significant affect on the Special Area of Conservation – this is contrary to LDP Policy 10 Sites and Species of European Importance – and appropriate assessment would be required if the application were to progress towards approval.

The application therefore does not provide a site layout that is acceptable in terms of biodiversity as the present site layout would impact on a Section 7 habitat (purple moor grass and rush pasture).

The site layout does also not deliver sufficient continuation of ecological features. This is contrary to the requirements of LDP 2 Policy 8 Special Qualities criterion g which requires that species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value.

This is also contrary to the requirements of PPW 12. Failure to provide sufficient information for the Authority to be able to carry out a Habitats Regulations Assessment means the Authority cannot be sufficiently certain that the proposal would comply with Policy 10 Sites and Species of European Importance which seeks to ensure development will not have a significant effect on a European Site.

Land Drainage and Water Supply

Policy 32 Surface Water Drainage requires development to incorporate sustainable drainage systems for the disposal of surface water on site.

The planning application states that surface water will be disposed of by means of soakaway and sustainable drainage systems. From 7th January 2019, all new developments of more than 1 property or where the construction area that has drainage implications is 100 square metres or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins. Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

The information on surface water supplied as part of the application so far only addresses the proposed extension area of the site and does not clarify how the existing site area (including the lodges being placed onto existing touring spaces) would link up to the new system or be otherwise addressed. It is noted that a number of third-party responses have also highlighted issues with regard to disposal of water from hot tubs at the site and no information on this element has been supplied at the time of report writing.

Officers at present do not consider that the information supplied with the application demonstrates sufficient certainty that Policy 32 Surface Water drainage will be complied with.

With regards to foul water disposal - NRW as part of their response, have raised concerns that at present there is a lack of information around the method of foul drainage proposed. They advised in their response of 28/11/22 that they required further details of the sewage system and its capacity to take increased loadings from the proposal. They note that whilst the application refers to a package plant, their records show a linked series of septic tanks to soakaway and note that the system utilised should be in line with the hierarchy set out within the WG Circular 008/2018 in respect of the use of private sewerage in new development, incorporating septic tanks and small sewage treatment plants. Whilst NRW have suggested a pre-commencement condition requiring information on foul water to be submitted and approved by the LPA - the issue of sewage disposal is one that the PCNPA Ecologist requires information on in order for her to be able to undertake an appropriate assessment pursuant to the Conservation of Species and Habitats Regulations 2017, given proximity to the Marine SAC.

The application at present therefore is not supported by sufficient evidence to demonstrate compliance with WG Circular 008/2018, Policy 10 or Policy 32 of the PCNPA LDP2 with respect to disposal of foul and surface water.

With regards to Water Supply – Dwr Cymru responded to note that the development will require the installation of a new single water connection to serve the new premises. The water supply system serving the development is currently at capacity and the provisions of Section 45 of the Water Industry Act 1991 apply. They have suggested that should planning permission be granted a pre-occupation condition would be necessary.

Other Material Considerations

A Tourism Need and Economic Impact Assessment has been provided which evidences the economic benefits of the proposal. The visitor economy is a key industry for Pembrokeshire and Officers recognise the economic benefits such a development may bring. This is not considered however, to outweigh the other policy issues identified above.

Conclusion

It is considered that the proposal fails to accord with the relevant policies of the Pembrokeshire Coast National Park Authority Local Development Plan 2 with regards to the principle of development, landscape and special qualities, light pollution, biodiversity, amenity and surface water and that planning permission should be refused. Matters of water supply and highways access could be dealt with acceptably via planning condition.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle, through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

Recommendation

Refuse for the following reasons

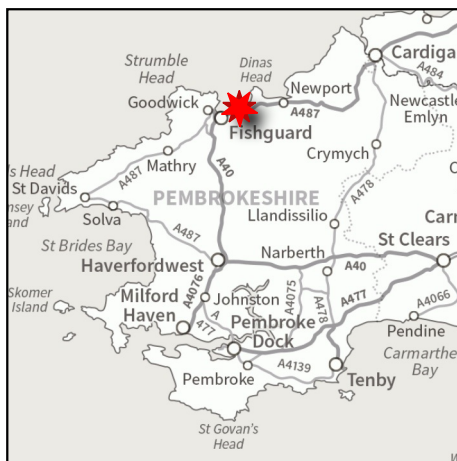
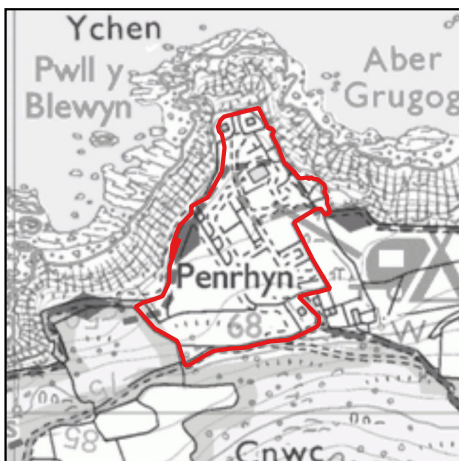
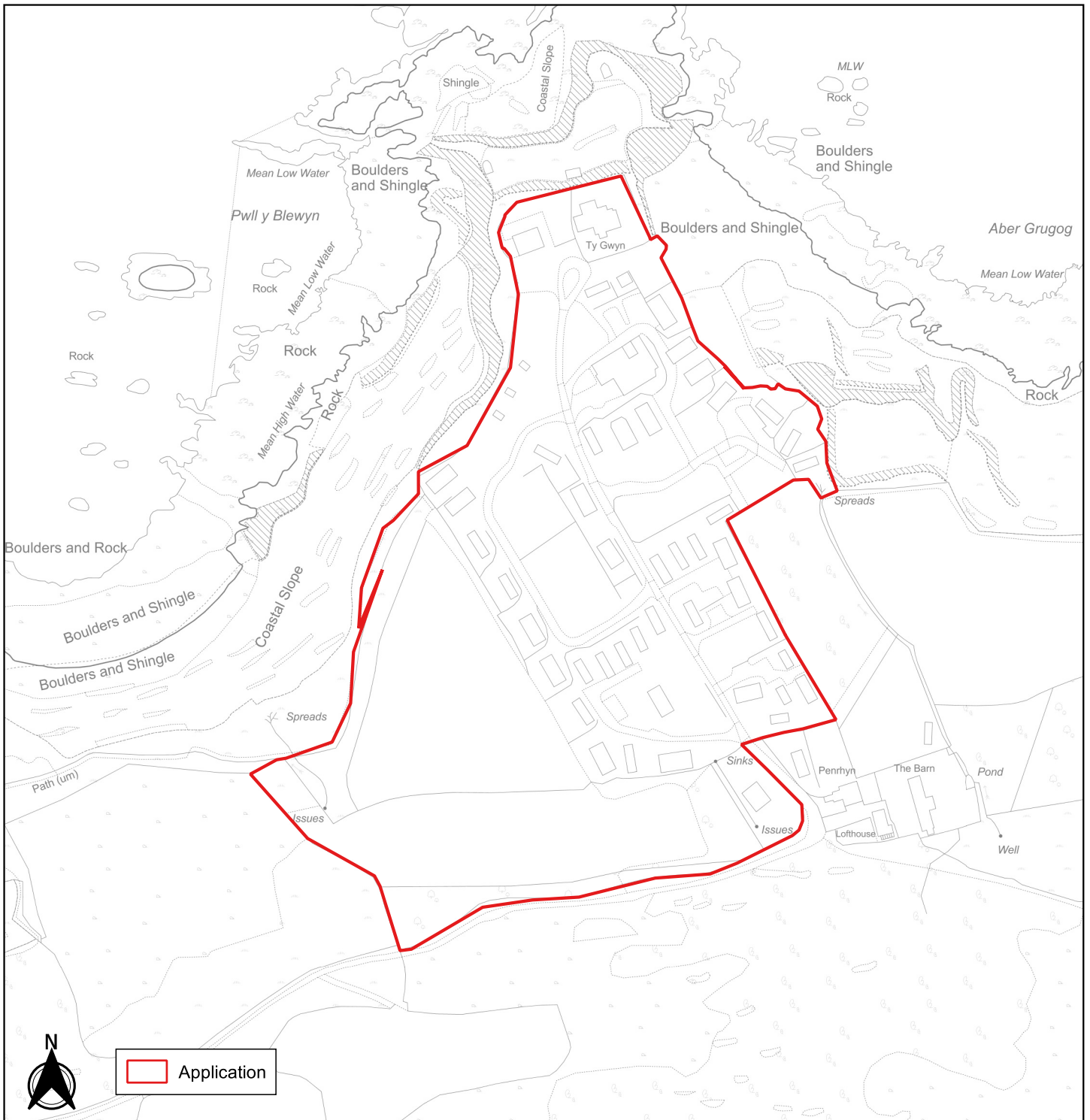
1. The proposal is considered likely to have a significant detrimental impact on the special qualities of the National Park by intensifying the visual impact and intrusion of a large static caravan site within the extensive coastal views of this section of the National Park. The proposal therefore does not comply with Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation and Enhancement), 38 (Visitor Economy) and 41 (Caravan, Camping and Chalet Development) of the PCNPA LDP 2.
2. The proposed intensification of the density of the existing caravan and camping site and the development of the prominent area to the west with a high density, rectilinear plan does not demonstrate an integrated approach to design with respect to place and local distinctiveness in this location. This is contrary to Policy 29 Sustainable Design of PCNPA LDP2 and to the PCNPA Supplementary Planning Guidance on Caravan, Camping and Chalets.
3. The landscaping proposed as part of the development is not appropriate in terms of species and condition to respond to the specific locational conditions of this exposed coastal location. This is contrary to Policy 29 Sustainable Design of PCNPA LDP2 with regard to the environment and contrary to Planning Policy Wales Edition 12.

4. The extension into the area west of the current caravan site is considered likely to have an unacceptable impact on light pollution and dark skies, contrary to the requirements of Policy 9 (Light Pollution) of the PCNPA LDP2.

5. The proposed site layout is unacceptable in terms of biodiversity as it would result in the loss of a Section 7 habitat (purple moor grass and rush pasture) of principle importance under the Environment (Wales) Act 2016 and would not ensure sufficient continuation of ecological features. This is contrary to the requirements of Planning Policy Wales Edition 12 and Policy 8 (Special Qualities criterion g) of the PCNPA LDP2.

6. The proposal is considered likely to have an unacceptable impact on neighbouring residential amenity through increased noise and traffic movements. This is contrary to the requirements of the PCNPA LDP 2 Policy 30 (Amenity).

7. The application is not supported by sufficient evidence with regards to foul water and surface water disposal to demonstrate compliance with WG Circular 008/2018, Policy 10 (Sites and Species of European Importance) or Policy 32 (Surface Water Drainage) of the PCNPA LDP2. The Authority is therefore unable to conclude that there would not be a likely significant effect on the West Wales Marine SAC under the Conservation of Habitats and Species Regulations 2017 and it does not have sufficient information to carry out the appropriate assessment required.



NP/22/0635/FUL

Fishguard Bay Resort, Penrhyn Road,
 Dinas Cross, Fishguard, SA65
 9ET
 Fishguard Bay Resort, Penrhyn
 Road, Dinas Cross, Fishguard, SA65
 9ET

Graddfa/Scale: 1:2,500



Parc Cenedlaethol
 Arfordir Penfro
 Pembrokeshire Coast
 National Park