

## REPORT OF THE DEVELOPMENT MANAGEMENT MANAGER ON APPEALS

The following appeals have been lodged with the Authority and the current position of each is as follows:-

**EC21/0041** Installation of four rooflights within the front roof slope elevation and the erection of a glass balustrade along the front boundary forecourt - Cambrian House, Settlands Hill, Little Haven, Haverfordwest, Pembrokeshire, SA62 3LA

**Type** Written Reps

**Current Position** The initial documentation has been forwarded to PEDW

**NP/22/0600/FUL** New campsite on existing arable farmland and scrubland. Proposal for small static camping of 8no. self-contained pods, and small seasonal pitches with associated facilities within existing barn structure – Land south of Haroldston Hall, Haroldston West

**Type** Written Reps

**Current Position** The appeal has been dismissed and a copy of the Inspectors decision is attached for information.

**NP/24/0005/FUL** Proposed first floor roof extension, new entrance porch, replacement side extension and solar panels - The Champions, Nolton Haven, Haverfordwest, Pembrokeshire, SA62 3NH

**Type** Written Reps

**Current Position** The initial documentation has been forwarded to PEDW



## Appeal Decision

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by Helen Smith BA(Hons) BTP MRTPI

an Inspector appointed by the Welsh Ministers

Decision date: 03/05/2024

Appeal reference: CAS-02981-B6Y8Y6

Site address: Land South of Haroldston Hall, Haroldston West, Pembrokeshire, SA62 3NA

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- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Mr James Owen against the decision of the Pembrokeshire Coast National Park Authority.
  - The application Ref NP/22/0600/FUL, dated 11 October 2022, was refused by notice dated 3 April 2023.
  - The development proposed is a new campsite on existing arable farmland and scrubland. Proposal for small static camping of 7No. self-contained pods and small seasonal pitches with associated facilities within existing barn structure.
  - A site visit was made on 11 March 2024.
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### Decision

1. The appeal is dismissed.

### Procedural Matters

2. Since the submission of the appeal, Edition 12 of Planning Policy Wales (PPW) has been published. However, as it consolidates previously published content it does not raise any new matters that have any significant bearing on the decision.
3. The description of development on the application form and Decision Notice includes reference to 8 self-contained pods. However, amendments to the planning application included, amongst other amendments, the reduction in the number of self-contained pods to 7. It is clear that the National Park Authority (NPA) made their decision on the basis of these amended plans, as have I. In the interests of accuracy, I have altered the description of the development proposed to reflect the reduction in the number of self-contained pods.

### Main Issues

4. These are:
  - (a) whether the proposed development complies with planning policies relating to development in the countryside, having particular regard to its location within the Pembrokeshire Coast National Park (PCNP), and sustainable development; and

(b) the effects of the proposed development on ecological interests.

## Reasons

### *Countryside*

5. The appeal site is within the open countryside, as identified by Policy 7 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP), characterised by an open agricultural landscape and gently undulating fields interspersed with hedging and areas of woodland. The site comprises of the eastern and southern part of a large arable field, with a plateau in the northern section of the site, which gently slopes to the south towards a woodland surrounding a large pond. The eastern part of the site includes an area of woodland with a watercourse running through it forming a gully in between the two fields. The site includes an isolated open sided modern hay barn near its entrance. The nearest group of buildings, Haroldston Hall, is some distance to the north. Given its position on high ground partly within a large open field, the appeal site has wide open views of the surrounding countryside and the coast and is visually prominent in the wider landscape, despite the woodland on the eastern and southern boundaries of the site.
6. LDP Policy 7 seeks to ensure that outside the identified Centres, development is strictly controlled. It identifies forms of development that will be acceptable in principle in the countryside including, amongst other things, farm diversification and a rural enterprise or tourist attractions or recreational activity where the need to locate in the countryside is essential. This policy accords with the objectives of PPW which, amongst other things, seeks to ensure that development in the countryside be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation.
7. My attention has been drawn to criterion (c) of LDP policy 7 which relates to the conversion of appropriate buildings. However, whilst the proposal includes the siting of an amenity building within the open sided hay barn, as it does not comprise of the conversion of this building, I do not consider this criterion particularly relevant.
8. In support of policy 7, policy 45 permits farm diversification proposals where, amongst other things, the scheme assists in sustaining the agricultural unit, is compatible with its location and is in harmony with and/or enhances the National Park landscape. Although the appellant contends that the proposal encapsulates 'farm diversification', no evidence has been submitted demonstrating that the proposal would assist in sustaining the agricultural unit. I acknowledge the appellant's intention to provide hippotherapy services in the future. Nevertheless, such an activity does not presently exist and does not form part of this proposal. Therefore, in this instance, the proposal cannot be considered as a scheme for farm diversification permitted by policy 7 and 45. Whilst I recognise that camp sites are particularly desirable to visitors in quiet rural locations, the desire to site the proposal in an area to enable guests to enjoy the surroundings is not a suitable justification for its location. The proposal therefore does not demonstrate that the need to locate in an isolated countryside location is essential. Consequently, the proposal would result in unacceptable development in the countryside.
9. Furthermore, LDP policies 38 and 41 permits limited caravan, camping and chalet development away from the coast and Preselis and in locations not intervisible with them and sets out criteria for such proposals. In support of policy 41, the NPA's 'Caravan, Camping and Chalet' Supplementary Planning Guidance (SPG) assesses the capacity, i.e. the ability to accommodate landscape change, and sensitivity of existing Landscape Character Areas (LCA's) in the PCNP to accommodate a range of different types of caravan, camping and chalet developments. The site's LCA is identified as having medium sensitivity for small static sites and medium to low sensitivity to small seasonal

sites. It also identifies limited capacity for new sites and states that of the LCA is highly intervisible with St Brides Bay.

10. The proposal would include static pods, elevated from the ground by metal supports, and pitches for tents and soft structure glamping. Although 3 of the static pods would be located within the lower gully part of the site, the remainder would be sited on the more visibly prominent sloping part of the site. Having regard to the site's prominent location within the open and undulating landscape, its intervisibility with the coast, and its location away from any associated farm complexes, the proposal would be an isolated, sporadic and visually obtrusive form of development in the landscape, despite the proposed hedge planting and landscaping. This would, having regard to the limited capacity of the LCA to accommodate change, have a harmful effect on the special qualities of the landscape and would fail to conserve and enhance the natural beauty of the PCNP.
11. For the reasons set out above, the proposed development would result in an unacceptable development in the countryside which would have a harmful effect on the Pembrokeshire Coast National Park, contrary to policies 7, 38, 41 and 45 of the LDP and the SPG. It would also be contrary to policies 1 and 14 of the LDP which seek to, amongst other things, ensure that development within the NP is compatible with the conservation of the natural beauty, wildlife and cultural heritage of the park; and to protect the qualities and special landscape and seascape character of the PCNP.

### *Sustainability*

12. Policies 29 and 59 of the LDP seeks to ensure, amongst other things that proposals for development will be required to be well designed in terms of accessibility, promote sustainable travel choices and reduce the need to travel by car. These policies are in general accord with the thrust of PPW to reduce the reliance on the private car.
13. The appeal site is located some 2 miles away from Broadhaven, which is the nearest settlement with some facilities. Access to the site would be via narrow rural roads with no footways, limited lighting and limited public transport links, despite the Fflecsi bus service. Although the proposal would include a path linking the site to walking routes which lead to Broadhaven, due to the rural nature and length of these routes, they are more suited for leisure purposes as opposed to accessing services such as shops.
14. Given the proposal's isolated location, guests would be reliant on accessing facilities and services off site some distance away. Consequently, and having regard to the limited public transport provision and the highway conditions I have identified, guests of the facility would be heavily reliant on the car as opposed to other more sustainable transport options, such as walking, cycling or public transport. I have had regard to the appellant's intention to operate a shuttle bus service and to provide electric bikes for hire for use by the guests. However, full details are not before me. Furthermore, one cannot compel guests to use these facilities. The proposed development is therefore within an unsustainable location.
15. The appellant has drawn my attention to other examples of camp sites in the locality, however, full details of these sites are not before me. In any event, the presence of other camp sites in the locality would not justify the granting of an unsustainable development.
16. I conclude that the proposal would result in unsustainable development, contrary to policies 29 and 59 of the LDP and PPW.

### *Ecology*

17. The Preliminary Ecological Appraisal (PEA) identifies the main part of the site as comprising of an arable field, disturbed ground and an agricultural building of low

ecological value. However, the site also comprises priority hedgerow, wet woodland and pond habitats. The site is located within 2km of the West Wales Marine Special Area of Conservation (SAC) and the Pembrokeshire Marine SAC.

18. Policies 1, 8, 11 and 30 of the LDP seek to, amongst other things, protect, conserve and enhance wildlife and habitats, nationally protected sites and species, and the quality of the environment. These policies are consistent with the aims of PPW and Policy 9 of Future Wales (FW) to protect and enhance habitats and biodiversity and to improve the overall resilience of ecosystems through the application of a stepwise approach.
19. Whilst the majority of the pitches and pods would be sited within parts of the site with lower ecological value, the proposal includes works within the more ecologically sensitive areas of the wet woodland, close to the pond and watercourses, including the siting of septic tanks, a walkway and picnic areas. Full details of these works and any required vegetation/tree clearance have not been submitted. Consequently, the full impacts on the most ecologically sensitive parts of the site are unclear.
20. Furthermore, I note that the recommendations of the PEA includes further bat surveys of trees should any be required to be removed from the woodland. In the absence of information in relation to impact on trees in the wet woodland, I cannot be sure that any potential mitigation would be sufficient to mitigate any identified harm. I note NRW have not raised any objections. However, this is on the basis that the recommendations and conclusions of the PEA are carried out. In these circumstances, I cannot be sure that the proposal would not harm important wet woodland habitat or bats.
21. As I have found that the proposal would potentially harm woodland habitat and bats, I am unable to conclude that the proposed enhancements of bat and bird boxes, wildflower planting, native hedge planting, use of native species in the landscaping scheme, and a reptile hibernaculum would provide a net gain in biodiversity. Whilst I recognise the appellant's desire to rebuild the ecosystems and their intention to take more farmland out of production and plant more trees, these do not form part of the proposal before me. In these circumstances, a condition to secure a scheme of enhancements would not be appropriate.
22. Whilst the PEA concludes that the impact on the SAC's would be negligible, this is in the absence of information in relation to the potential ecological impacts of the works within the wet woodland. The NPA contend that given the potential extent of vegetation clearance there is insufficient information to undertake a Test of Likely Significance of the proposal's impact on the SAC's. However, as I am dismissing the appeal on other substantive grounds, I have not needed to consider this matter further.
23. I conclude that the proposal would be harmful to ecological interests contrary to policies 1, 8, 11 and 30 of the LDP, Policy 9 of FW and PPW.

### **Other Matters**

24. I have had full regard to the personal circumstances of the appellant. However, the effect of a development on the countryside, sustainability and ecology is a matter of public interest. The harm that I have identified would be significant and would be likely to endure in posterity.
25. I note the representation in relation to potential highway safety concerns. I have no cogent evidence that this would be the case. The NPA have raised no concerns in relation to this matter and I have no reason to disagree. In regard to light pollution, had I allowed the appeal, I'm satisfied that a suitable condition could control external lighting to an acceptable degree.

**Conclusion**

26. For the above reasons, and having regard to all matters raised, the appeal should be dismissed.

27. In reaching my decision, I have taken into account the requirements of sections 3 and 5 of the Well-Being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives.

*H Smith*

INSPECTOR