<b>Application Re</b>	f NP/16/0266/FUL

Case Officer Applicant Agent Proposal	Redevelopment & relicient creation of 58 addition reduction in number of 11 existing staff caray creation of 2 bases for of shop (and relocation removal of laundrette service yard; removal spaces & creation of of spaces; upgrading of for access into the tow existing attenuation per relocation of play area		
Site Location	Kiin Park Holiday Centre, Marsh Road, Tenby, Pembrokeshire, SA70 7RB		
Grid Ref	SN11950016		
Date Valid	10-May-2016	Target Date	12-May-2017

The application is referred to the Development Management Committee for determination as the application is a falls with the category of major applications reserved to the Committee.

## **Site and Development Description**

The application site forms part of a holiday park located to the south of Tenby. The site covers approximately 44 hectares of developed and greenfield land. The holiday park comprises static caravan, touring caravan and tent pitches and various entertainment and leisure facilities.

Access to the site is gained via the A4139 and there are a number of public footpaths which cross the park.

The holiday park falls partly within Pembrokeshire Coast National Park Authority's boundary and partly within Pembrokeshire County Council's (PCC) boundary. Approximately 80% of the holiday park falls within the National Park and the western section of the holiday park falls within PCC.

A planning application for the creation of a maintenance area, staff accommodation, replacement of tent pitches and 11 staff static accommodation with 22 static caravans and the realignment of the internal road has been submitted to PCC (16/0122/PA refers). The application has been referred to the PCC Planning & Rights of Way Committee for consideration on 25<sup>th</sup> April 2017.

A previous consent tied the whole park to a maximum of 620 static caravan bases which is being increased by this application to 678. The condition limiting the both sides of the site to a maximum of 620 was previously applied to consents on both sides, but would be superceded if this consent is granted.

The development within PCNPA boundary proposes:-

Relocation of 117 existing caravan bases 58 additional bases for static caravans Reduction in touring and tent pitches Demolition of shop and launderette (relocation in PCC area) Additional 44 car parking spaces Upgrading of pedestrian access Works to and extension of existing attenuation pond Removal of crazy golf facility Relocation of play area and associated landscaping

The masterplan illustrates that these consist of:

Area B – removal of existing supermarket and maintenance compound and replacement with 18 bases, plus 3 bases on existing car park

Area C – removal of existing 39 touring caravans and replacement with 21 static bases

Area D - redevelopment of 19 existing bases with 17 additional proposed

Area F – new development of 10 bases overlooking lime kilns

Area H - Redevelopment of existing reception and car parking area

The applicant states in their submission:-

the overriding principle is for continued improvement of the existing caravan park by the introduction of high quality development areas of static caravans and landscaping enhancement.

to continually improve the quality of visitor accommodation and facilities. ... A lack of investment would result in stagnating facilities attracting fewer visitors, and therefore, falling income.

The increased demand for higher grade accommodation and the price premium holiday guests are prepared to pay for higher grades of accommodation/ facilities have been recognised ... the Company aims to meet the new levels of demand, with improved levels of accommodation, park standards, services, entertainment, eating establishments and other facilities.

The number of visitors to Kiln Park in 2015 was 65,316. This figure represents a 1.7% increase on the 64,206 visitors recorded in 2014

In terms of employment, as of 4 April 2016 Kiln Park employs a total of 172 staff, including 36 permanent and 136 temporary staff. The Park also employs a contracting firm of approximately 40 local cleaners. The number of temporary staff increases during the summer months and in August 2015 the park employed a total of 241 staff. The majority of staff at Kiln Park live locally, with 19% residing within a mile of the Park and 97% living in Pembrokeshire.

Kiln Park contributes expenditure of approximately £6.3 million to the local economy per annum, including a total of £2.6 million in expenditure by the Park itself and £3.7 million from visitor spending on local goods, services and activities.

The Park will be reconfigured to provide an improved visitor experience alongside significant environmental benefits in the form of an improved layout, a less dense development form, additional and improved landscaping, parking and access improvements. Environmental benefits also include ... the removal of the large building to the south east of the Park.

Other demonstrable environmental benefits include a net reduction in pitches, a reduction in buildings on the site, clear layout improvements, a decrease in caravan density, improved landscaping, ecological improvements ... as well as improvements to parking and access.

Alongside the environmental benefits, the proposed development will provide valuable economic and social benefits.

The application has been placed on hold since its original submission in May 2016 due to an objection from Natural Resources Wales on the basis of flooding. The area which was to be placed in the flood zone has since been removed from the application and those caravans redistributed within the existing confines of the site to respond to the objection, which has now been removed.

### Relevant history

The planning history of this site is complex but the situation appears to be that within the National Park area there is permission for:

- 500 static caravan pitches
- 60 touring caravan pitches
- 125 unit pitches
- 55 tenting pitches

#### **Consultee Response**

**CADW - Protection & Policy:** The addition of the caravans will have an adverse impact to the setting of the kilns but as there will still be a relatively large open area in front of them, in our opinion this impact will be slight.

**PCNPA - Buildings Conservation Officer**: Advised any works to listed building would require listed building consent.

PCNPA - Tree and Landscape Officer: Conditional consent.

PCNPA - Ecologist: Conditional consent

PCC - Drainage Engineers: Advised permits required by NRW.

Dyfed Archaeological Trust: Conditional consent.

Dwr Cymru Welsh Water: Advised on sewerage

PCNPA - Access Manager: Conditional consent

**Tenby Civic Society Chairman**: We welcome the thoroughness of the information, and only have some residual concerns.

**Tenby Town Council:** Members welcome the investment being made & recommended approval of the plans. However, there are some concerns over the effects on the Ritec flood plains of continued infill of land & alterations of levels

PCC - Drainage Engineers: Conditional Consent

PCC - Contaminated Land Inspector: Conditional Consent

Dyfed Archaeological Trust: Conditional Consent

PCC - Transportation & Environment: Conditional Consent CADW - Protection & Policy: Approve

# Public Response

The application was advertised in the local press, on site and neighbor notification letters were posted in accordance with the requirements of the Town and County Planning (Development Management Procedure) (Wales) Order 2012.

# Policies considered

Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website -<u>http://www.pembrokeshirecoast.org.uk/default.asp?PID=549</u>

LDP Policy 01 - National Park Purposes and Duty

LDP Policy 02 - Tenby Local Service and Tourism Centre

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest

LDP Policy 11 - Protection of Biodiversity

LDP Policy 13 - Historic Landscapes Parks and Gardens

LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park

LDP Policy 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 32 - Surface Water Drainage

LDP Policy 34 - Flooding and Coastal Inundation

LDP Policy 35 - Visitor Economy

LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites

LDP Policy 39 - Upgrading Statics, Touring Sites and Tent Pitches

LDP Policy 40 - Site Facilities on Tent, Chalet and Caravan Sites

LDP Policy 41 - Change of Use from Tent Pitches to Touring Caravan Pitches

LDP Policy 48 - Community Facilities and Infrastructure Requirements

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

LDP Policy 54 - Cycleways

PPW9 Chapter 04 - Planning for Sustainability

PPW9 Chapter 07 - Economic Development

PPW9 Chapter 11 - Tourism, Sport and Recreation

PPW9 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG04 - Planning Obligations

SPG05 - Sustainable Design

SPG06 - Landscape

SPG13 - Archaeology

TAN 13 - Tourism

TAN 15 - Development and Flood Risk

TAN 23 - Economic Development

## **Constraints**

Special Area of Conservation - within 500m Site of Special Scientific Interest - within 50m Technical Advice Note 15 Contaminated Land LDP Green Wedge LDP Mineral Safeguard Biodiversity Issue Rights of Way Inland - within 50m Ancient Monument - within 50m ROW Coast Path - within 10m Potential for surface water flooding LDP Centre:60pc aff housing;30 units/ha Recreation Character Areas

## **Officers Appraisal**

The application raises the following planning matters:-

- Policy and Principle of Development
- Visual Amenity and Special Qualities of the National Park
- Highway Safety and Access
- Biodiversity
- Trees and Landscape
- Flooding
- Historic Environment

## Policy and Principle of Development

The site lies within the countryside as classed within the Local Development Plan (LDP), as such, Policy 7 of the LDP is relevant. Policy 7 controls development within the countryside and only permits particular developments

within the countryside, tourist attractions being one. The site is a long established holiday park, therefore, the principle of the development to enhance this established use is considered acceptable.

Policy 7 makes reference to Policy 35 of the LDP being applicable to tourist attractions in the countryside. Policy 35 is the strategic policy for the visitor economy in the National Park. Policy 35 seeks to attract visitors outside of the peak season while ensuring that National Park environment is conserved and enhanced as a landscape of national and international importance.

Policy 38 of the LDP supports Policy 35 by stating:-

'New camping, caravanning, static caravan or chalet sites or extensions of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted.

Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape."

The proposed development will result in a reduction from 185 'touring' pitches (which can be used for either caravans or tents) to 87 with an increase in 58 static caravan pitches but will not result in an increase to the overall area of the holiday park. Additionally, the impact of the increase is offset by the considerable landscape improvements proposed, and consequently, the development is considered to be acceptable in terms of Policy 38.

Although located within the countryside the holiday park is well connected to Tenby Local Service and Tourism Centre as defined by Policy 2 of the LDP.

## Visual Impact and Impact on the Special Qualities of the National Park

Policies 8 and 15 of the Local Development Plan require that new developments ensure that the sense of remoteness and tranquillity is not lost and is wherever possible enhanced, whilst ensuring that development does not cause visual intrusion and is not insensitively located within the landscape.

The application is supported by a comprehensive Landscape and Visual Impact Assessment (LVIA). The site is not a highly prominent site in the landscape and is screened from the seascape by the existing line of dunes the south. The impact of the proposed development is not considered to result in a harmful change in the immediate landscape character or the wider landscape. With the extent of the additional landscaping proposed, it is considered that the development will result in a positive impact on the visual amenities of the area and the special qualities of the National Park.

Conditions are recommended in respect of the proposed landscaping to ensure that the positive impacts on the visual amenity and the special qualities of the National Park are achieved.

## Highway Safety and Access

The highway implications of the proposed development are not considered to be significant given the existing on site situation and the vehicular access will remain as existing. The holiday park is within cycling and walking distance of Tenby Town Centre and beaches and the holiday park is served by a bus. The site is at a sustainable location in terms of accessibility.

The development has been assessed by PCC Highways department who have raised no objection to the proposal subject to a Grampian condition requiring off site works to improve pedestrian links to the site.

## Flooding

The majority of the site is located within the defined flood zone of the watercourse (The Ritec) that follows the northern boundary of the holiday park. The application is supported by a Flood Consequences Assessment, the application has been amended since originally submitted to overcome concerns raised by Natural Resources Wales (NRW). Pitches have been relocated from lower to higher land levels in order to reduce the risk of flooding. In areas where relocation has not been possible the pitch numbers have been reduced from those originally proposed. The application proposes to replace tents with statics which is considered to be an appropriate improvement in terms of flood risk. Flood risk on the site has been reduced by the proposed development and NRW consider that betterment would result. The proposed development is therefore considered to comply with Policy 34 of the LDP, Planning Policy Wales and TAN15 (Development and Flood Risk).

In respect of drainage a consultation response from Dŵr Cymru/Welsh Water has been received in response to further information provided by the applicant, and Dŵr Cymru has no objection subject to condition.

## Historic Environment

The application site is located within the vicinity of the schedule ancient monuments known as Black Rock Quarry and the Watchtower. The application was accompanied with a Historic Environment Assessment.

Strategic Policy 8 of the LDP states that the special qualities of the National Park will be protected and enhanced and states that protecting and enhancing the historic environments is a priority. CADW were consulted on the application and did not object to the development. CADW advised that there would be no adverse impact on the Watchtower, and the impact on the Black Rock Quarry Kilns would be slight given the relatively large open areas between the kilns and the proposed static caravans. CADW have not commented on the amended plans and any response received will be verbally reported at Committee. Dyfed Archaeological Trust has assessed the application and has raised no objection subject to a condition.

The proposed development is, therefore, considered to be acceptable in terms of its impact on the historic environment of the National Park.

### **Biodiversity**

PPW, TAN5 and Policy 11 of the LDP require biodiversity considerations to be taken into account in determining applications for planning permission. 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. Survey work has been carried out as part of the application and has found that the development would result in a slight beneficial effect in terms of biodiversity.

PCNPA Ecologist has raised no objection to the proposal subject to a condition.

### Trees and Landscape

The scheme has proposed a significant scheme of landscaping in order to provide environmental benefits to the park. The Tree and Landscape Officer has been consulted and stated:

In reference to the above application there would be no objection in principle to the proposed development following clarification of the following points:

- 1. Construction Exclusion Zone amendment clarification
- 2. Specific details of proposed new planting
- 3. Landscape management

4. The provision of this information will allow an informed response to be made on the suitability of the proposed development in accordance with the tree and landscape features on and immediately adjacent to the development site.

Conditions in respect of Planting Details, Landscaping Implementation, Landscape Management Plan and Construction Exclusion Zone could be applied to any planning approval to ensure that the necessary information is made available prior to commencement of the development.'

Further information has since been received and a verbal update of the Tree and Landscape Officers response will be made to Committee.

## Tenby Civic Society comments

The Civic Society have responded to indicate that they welcome the removal of 'Area A' (which was in the floodplain); that it is not clear how the net increase/decrease is being achieved, and emphasised that there should be no further extension to the site boundaries.

Concerns were also expressed that more planting is needed within the interior of the site to alleviate the impact of the existing site from the hillsides around and that the risk of flooding will require monitoring.

The concerns of the Civic Society have been passed to the Agents for this application, and the comments regarding additional tree planting can be taken into account with a condition requiring a final landscaping scheme to be approved prior to development commencing.

## Conclusion

Natural Resources Wales have considered that the revisions to the numbers and siting of tourers and statics represent a betterment to the park as a whole in terms of flood risk, and combined with the comprehensive landscaping scheme proposed, it is considered that the environmental improvements are sufficient to allow this scheme to be supported subject to appropriate conditions.

- The development shall begin not later than five years from the date of this decision.
   Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).
- The development shall be carried out in accordance with the following approved drawings:- 668/41/1 received 13<sup>th</sup> April 2017, 668/41/2 received 6<sup>th</sup> March 2016, 668/41/4, 668/41/6, SK02, SK04, SK05 & SK06 received 10<sup>th</sup> May 2016.
  **Reason**: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).
- No development or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme of landscaping. The scheme shall include indications of all existing trees (including spread and species) and hedgerows on the land, identify those to be retained and set out measures for their protection throughout the course of development.
   Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

4. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

**Reason**: In the interests of protecting the visual amenity and special qualities of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

- A landscape management plan, including management responsibilities and maintenance schedules for all landscaped areas, shall be submitted to and approved in writing by the local planning authority prior to the occupation of any of the dwellings on the site. The landscape management plan shall be carried out as approved.
   Reason: In the interest of protecting visual amenity and the special qualities of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).
- 6. The static caravans hereby approved shall be occupied as holiday accommodation only and shall not be occupied as a person's sole or main place of residence. An up to date register shall be kept at the holiday accommodation hereby permitted and be made available for inspection by the local planning authority upon request. The register shall contain details of the names of all of the occupiers of the accommodation, their main home addresses and their date of arrival and departure from the accommodation.

**Reason**: In order to ensure that the accommodation is occupied solely for holiday letting purposes only and not for any other residential purpose. Policy: Local Development Plan – Policy 37 (Self Catering Development).

7. If evidence of contamination is found in or around the development area, development must cease until a report on potential contamination of the site has been prepared by an appropriately qualified person and submitted to and approved in writing by the local planning authority. The report shall include a phased investigation approach, incorporating risk assessment, to identify the extent of contamination and any measures required to remediate the site, including post development monitoring.

Reason: To ensure protection of the environment.

8. No development shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of

archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved, in writing, by the National Park Authority, prior to development commencing.

**Reason**: To assess the archaeological value of the site and the Local Development Plan - Policy 8 - Special Qualities and PPW3 Chapter 6.

- Before development commences details of any new lighting, including measures to control light spillage, shall be submitted to the National Park Authority for approval, in writing. Development shall be carried out and maintained in accordance with the approved details.
   Reason: To ensure that animal and plant species which within the terms of the Conservation (Habitats 2c) Regulations 1994 are effectively protected and the Local Development Plan – Policy 11 -Protection of Biodiversity.
- 10. No surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage network **Reason:** To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment.
- 11. Within two months of the operational use of the re-located shop approved under Pembrokeshire County Council consent No 16/0122/PA, the existing shop shall be demolished or such extended time period as is agreed through a variation of condition application. **Reason:** To ensure compliance with Policies 7 and 49 of the Local Development Plan.
- 12. Prior to commencement of development, a scheme for the provision of works to the adjacent public car park to include re-marking, signage and the provision of an alternative footpath route shall be submitted to and agreed by the Local Planning Authority. The scheme shall be implemented as agreed.

**Reason**: In order to ensure road safety, and of public amenity and convenience. Local Development Plan Policy 53.

13. The footpath and the disabled access ramp linking the Kiln Park site with the Pembrokeshire County Council Salterns Park and Ride Car Park shall be complete before first occupation of any of the residential units that are the subject of this consent. Reason: In order to ensure road safety, and of public amenity and

convenience. Local Development Plan Policy 53.

## Informative

The 28 day camping referred to on the masterplan (drawing 668/41/1 received 13th April 2017) but which is excluded from the red line for this application, does not benefit from Permitted Development Rights under the The Town and Country Planning (General Permitted Development) Order 1995.

