

## **P-04-423 Brooklands Nursing Home – Correspondence from the petitioner to the clerking team, 23.06.13**

Dear Sian,

Thank you for the opportunity to submit a further contribution to your committee proceedings. We note Pembrokeshire County Council's (PCC) recent update to your committee and therefore agree with their statement however we would like to draw your committee's attention to their statement becoming somewhat dated as developments have now moved on.

Pembrokeshire Coast National Park (PCNP) Development & Management committee has now published its sixty page planning report (NP/13/0093) in June- with a recommendation to refuse the application ( this will be sent in a 2nd email to yourself)

On Wednesday the 19th June the PCNP Planning & Development committee met to determine this application unfortunately PCC agent Hyder Consulting Ltd submitted a letter late on Tuesday evening 18th June informing PCNP that they were formally withdrawing the application ( please see letter- sent as 3rd email to yourself)

Therefore we the management of Brooklands Nursing Home along with the residents and their families have been left completely in the dark as to what PCC and its agent intend to do next - are they intending to submit a revised application? We have already had to endure twelve months of worry, stress and anxiety.

We are appealing to PCC to recognise that the site chosen adjacent to Brooklands was a totally inappropriate location to begin with- and indeed the PCNP planning officers have endorsed this view in their report.

I am unable to contribute further with any additional information at this point in time- but we sincerely hope that you are able to apply pressure to PCC to state their future intentions in order to alleviate the immense pressure we are all under.

Kind regards,  
Darren Umanee

**Application Ref: NP/13/0093**

<b>Application Type</b>	Full
<b>Grid Ref:</b>	SN12340388
<b>Applicant</b>	Mr I Westley, Pembrokeshire County Council
<b>Agent</b>	Mr D Jones, Hyder Consulting (UK) Ltd
<b>Proposal</b>	Construction of Civic Amenity & Recycling Centre, incorporating an internal access road, site access improvements, erection of a compactor shed, canopy shed & welfare office, provision of containers, skips & igloos, staff & visitor parking, weighbridge area and quarantine area, lighting & site signage, fencing & landscaping works
<b>Site Location</b>	Land adjoining Brooklands, Saundersfoot, Pembrokeshire
<b>Case Officer</b>	Liam Jones

**Summary**

This application proposes development consisting of a Civic Amenity and Waste Recycling Centre on land adjacent to Brooklands Nursing Home in New Hedges. The application is defined as a "major" application under the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. The scheme involves the provision of a range of waste management facilities to be contained within a central operating area and served by a public access road directly from the A478 which abuts the south boundary of the application site. The purpose is to provide a waste management facility for the collection and segregation of municipal refuse, serving the National Park Authority as well as the County Council area. The primary objective of the facility is to provide separate containment facilities for segregating recyclable materials from waste that will be disposed to landfill. The built development on site includes the provision of a compactor shed, canopy, fencing, lighting columns and the provision of skips and igloos throughout the site.

It is accepted in National Policy that enhanced waste recycling facilities will be required in order to meet European Targets for the recycling of priority materials (50% by weight by 2020). The Welsh Government has set its own targets of achieving zero waste in Wales by 2050 and recycling rates of a minimum of 70% across all sectors by 2025. Planning Policy Wales explains that a sustainable approach to waste management will require greater emphasis on reduction, re-use and recovery and less reliance on disposal without recovery and that waste should be managed (or disposed of) as close to the point of its generation as possible, in line with the proximity principle.

In order to assist regions across Wales in developing an integrated and adequate network of waste management facilities the Regional Waste Plan was introduced to provide strategic information on the types of waste facilities required and the types of locations likely to be acceptable. It introduced a

spatial dimension by producing an Areas of Search Map which was intended to be used at a strategic level by Local Planning Authority's in Local Development Plan preparation as a starting point to more detailed local level assessments and were not to be used to determine the appropriateness of proposals for individual waste management facilities. National Parks were automatically defined as exclusion areas in the maps showing the Areas of Search for facilities serving more than one area. As such it sets out two options for planning for new facilities for the management of National Park Authority waste arisings: either new facilities serving the National Park Authority area only or facilities to serve a wider area to be sited outside the National Park Authority.

It is clear from the application information provided that the existing Civic Amenity Site at The Salterns, Tenby is not providing the same rate of recycling found elsewhere in the County at Hermon, Manorowen, Pembroke Dock, St David's and Winsel.

It is also noted in the Pembrokeshire Coast National Park Local Development Plan that regard has been given in the supplementary text to Policy 27 (Local Waste Management Facilities) for the provision of a 'relocated enlarged facility' within the National Park provided that Policy 15 (Conservation of the Pembrokeshire Coast National Park) is met and on the understanding that the facilities would 'predominantly serve the National Park area'. It would appear that the Authority accepted that there could be no new facilities in the National Park in line with the Regional Waste Plan although an exception could be made due to the existence of the site at the Salterns, Tenby.

Following a detailed consideration of the merits of the application it has been concluded that whilst there is a need for a new or enhanced Civic Amenity Centre to serve South East Pembrokeshire the application site is not considered to be appropriate. The proposed development of the site is considered to represent an inappropriate and harmful urban form of development on land within the open countryside and along a key tourist route into the National Park. As such the proposed development will by its very form, character and scale erode the special character and qualities of the National Park and will not be compatible with the strategic aims of the National Park Authority and Policy 1 (National Park purposes and Duty) of conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of those qualities. Further to this concern there is a lack of information to conclusively demonstrate that the proposed site for a Civic Amenity & Recycling Centre will serve predominantly the National Park Area in line with the aims of paragraph 4.120 of the Local Development Plan given the absence of Narberth from the catchment area of the proposal.

In addition to the principle identified above the industrial appearance of the development and its facilities, the associated lighting columns, vehicle movements and signage will impact unacceptably upon visual amenity and the special qualities of the National Park contrary to the aims of policies 8 (Special Qualities), 9 (Light Pollution) and 15 (Conservation of the

Pembrokeshire Coast National Park). The lighting columns will by virtue of their form and positioning result in the introduction of new lighting into an otherwise unspoilt and unlit area of countryside contrary to the aims of policies 8, 9 and 15.

Finally whilst measures including the planting of bunds and provision of acoustic screens have been introduced in an attempt to mitigate noise, odour and disturbance from the development, particularly in view of its relationship with the adjoining Brooklands Nursing Home, there remains concern that the very form and nature of development will introduce disturbance to the lives of the vulnerable residents at Brooklands Nursing Home contrary to the aims of Policy 30 (Amenity). Whilst the scheme is not predicted to result in noise levels being any greater than that of the background noise of the adjoining highway and any odour could be dealt with by suitable management procedures the increased level of vehicular access and movement to and from the site, the scale of heavy vehicles entering and leaving the site, the nature and type of activity taking place on the site and the potential for sudden noise disturbance will likely impact upon the residents at Brooklands Nursing Home to an unacceptable degree.

In view of the above the application is recommended for refusal.

### **Consultee Response**

**Saundersfoot Community Council:** Objecting – Fully support the need for a new Civic Amenity Site but strongly object to this location, the members were made aware of an alternative site in Begelly and also have heard representations from Brooklands Nursing Home which provides specialist Dementia care and would be affected neighbour. We ask that the Pembrokeshire Coast National Park Authority Planning Committee listen to the extremely strong views of the Community and agree that this is not the right site for a major industrial development.

**Tenby Town Council:** Objecting – Members feel that the site location directly off the busy A478 trunk road into Tenby will create difficulties over access and egress to the facility – particularly with an estimated 340 vehicle movements per day – which could have an impact on road safety. Development of such a facility could set a precedent for further commercialisation along the A478 which would impact on the natural beauty of this area. The proposed development will have an adverse effect on noise and privacy amenity of neighbouring properties.

**Pembrokeshire County Council - Transportation & Environment:**  
Conditional Consent

**Pembrokeshire County Council - Head of Public Protection:** Conditional Consent

**Pembrokeshire County Council - Ecologist:** Conditional Consent

**Countryside Council for Wales:** No objection

**Coal Authority:** Conditional Consent

**Dwr Cymru Welsh Water:** No Objection – As the applicant intends using a cesspit facility we would advise that the applicant seeks the appropriate advice from the Building Regulations Authority or an Approved Inspector

**Dyfed Archaeological Trust:** No adverse comments  
**Natural Resources Wales:** Conditional Consent

### Public Response

This application was advertised in accordance with The Town and Country Planning (Development Management Procedure) Order 2012 by display of a site notice at the site on 13<sup>th</sup> March 2013 and advertised through the local press. Furthermore letters of notification were forwarded to neighbouring occupiers in the near vicinity as well as those who had written in prior to receipt of the application.

49 No. individual letters of objection have been received by the National Park Authority in direct response to the above advertisement of the application including 1 No. song.

In addition to the above a file of correspondence has been received from the owners of Brooklands Nursing Home. The file contains the following;

- Letters of objection from owners and manager of Brooklands Nursing Home
- **119** individual letters of objection including professionals from the health sector
- Copy of petition and online petition (owner of Brooklands Nursing Home states contains over **4800** signatures)

Given the level of objection to the scheme it is not possible to list or summarise all the individual letters of correspondence received. Full copies are of the correspondence received, however, are available for inspection on the planning application file. Notwithstanding this a selection of concerns raised from third parties are as follows;

- My mother who suffers from dementia lives at Brooklands and I am very concerned at the impact the civic amenity site would have on her own and other resident's well-being. There will obviously be significant noise from traffic and the operation of plant within the site but also from seagulls that are bound to gather. Sudden loud sounds such as that from breaking glass as it is being recycled will agitate my mother.
- The residents of Brooklands will lose a peaceful haven, which for many will be for their last days. The noise, smell and possible flies and vermin will render the garden useless. An added disadvantage will be the increased traffic on a main road.
- The site should never have been considered due to the proximity to Brooklands. I work on Waterloo Industrial Estate P. Dock and considerable noise can be heard now the new civic amenity site is functioning. i.e. skips and bins being moved, machines and lorries operating.

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- As a nursing manager of a large local domiciliary care agency I work with service users with dementia on a daily basis living within their own homes. Utilisation of their immediate outside surroundings of their home is paramount to their wellbeing. I feel very strongly that should such a large, noisy, smelly facility be put next door to Brooklands residents home it really would have a devastating effect on their wellbeing... There is documented evidence of the benefits quiet and tranquillity and garden activities for people with dementia.
  - The replacement facilities for the Salterns should be on an industrial site or remote from housing of any description
  - The close proximity of the site will inevitably have an adverse impact on the residents' enjoyment of the Home, particularly their enjoyment of the garden... Brooklands, is classified as an Elderly Mentally Impaired unit, which means that many of the residents suffer with early stage dementia.
  - Brooklands caters for up to 40 residents requiring specialist care due to suffering dementia or alzheimer's. It also employs some 73 staff who are local residents. The level of traffic which would be generated by the proposed application would almost certainly have a serious detrimental effect in respect of noise and visual impact. The benefit of the home's sensory garden would also be largely lost. The net result would be a serious deterioration in the lives and living environment of the residents and also potentially hamper the care and treatment of residents.
  - Location on the tourist route into Tenby would not be the welcome we wish to offer visitors, increase in traffic on the road, existence of more appropriate sites, the refusal of previous smaller planning applications on that particular site and the concern for the effect the noise will have on the vulnerable residents of Brooklands Nursing Home.
  - Such a site next to Brooklands would hinder access for families, causing potential road hazerds and be a nuisance to those who site out the back of the premises with their carers. It would also seriously damage Brooklands image with potential residents' families and the wider public.
  - There will be a significant noise impact on the home, not only noise from the site itself but also from the extra traffic that will be generated as a result. Dementia often worsens sensory stimulation and I foresee that the increase in noise could over stimulate, disorientate and cause distress for those with dementia at Brooklands... I am aware that in the thorough planning process that the noise impact will be made minimal. However, it is well documented that increased in even low-level noise can have a significant negative impact on quality of life for those with dementia (Cohen and Mansfield, 1995, McManus and McClenaghan, 2010, van Hoof et al.2010, Watchmen et al 2010, Woods, 2010).

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- Extra traffic generated by the site will increase the risk for those in the home and their carers. The decline in cognition that is a result of dementia can mean that individuals are often disorientated and may not be able to judge or perceive dangers from on-coming traffic. With increased traffic comes increased risk of a traffic accident for those with dementia living at the home.
  - Understand that finding suitable locations for a civic amenity site is a difficult process... However, it is vital not to plan for one in close proximity to a nursing home, in which the majority of residents have dementia. Not only does it pose real risks, it could also cause distress for this vulnerable group, who are unable to voice their own objections because of the condition they suffer with.
  - The construction of a Civic Amenity and Recycling Centre on land adjoining Brooklands Nursing Home would be inappropriate as it would: (1) Be contrary to the intention of Strategic Policies 1 and 7 and Policies 9, 12, 15, 27, 30 and 53 of the recently approved LDP, and (2) Have severe negative impacts on the 40 residents amenity/welfare at an established Nursing Home, its staff, visitors and reputation and (3) There are no specific courses of action covering disturbance associated with the construction phase of the proposals for the proposed Recycling Site / Civic Amenity Site. (4) The sequential test to site this operation in a prominent position in the PCNP landscape, that's highly visible in the public realm is not justified. Carew/Templeton and Kilgetty have options... all outside the PCNP.
  - Concerns regarding the volume of traffic particularly during the summer season and turning right into the site being difficult. The site access will be used during hours of darkness and with the A478 being unlit this will be unacceptable to road users.
  - An atmosphere of loud noises and malodorous smells will be carried directly to them (Brooklands Residents) on the prevailing westerly wind. Powerful floodlights would further intrude on the residents' daily lives.
  - The proposals constitute ribbon development along the A478 and would create a local landmark which no amount of landscaping could sufficiently conceal. Visitors to Tenby and Saundersfoot, especially by those travelling by coach or bus would have a grandstand view of the site. Tree planting will take in excess of a decade to be of any concealment value.
  - Potential pollution to land to the north of application site and similarly contamination of the water course which borders to land and potential implications of livestock drinking contaminated water.

- Loss of countryside in an area not allocated for development in the Local Development Plan, adding to the potential for more development pressure alongside this road.
- Accept that Tenby is the jewel of the area and that the only industry it has which offers employment is tourism yet proposing to put this site at its entrance.
- The new development being in such close proximity to a home which cares for elderly dementia and alzheimer's patients would disrupt resident' lives on a daily basis. The 340 vehicles which are expected to visit the site daily, as well as the increased volume of traffic from 9,900 to 10,568 along the New Hedges route in general, will most certainly affect the peaceful area that currently surrounds the home.

In view of the above the key areas of concern are as follows;

- Location of site adjoining Brooklands Nursing Home
- Impact on amenity of residents
- Noise
- Traffic and Safety
- Pollution

### **Policies Considered**

The key policies, both National and Local to be considered as part of the application are outlined fully below. Please note that the Local Development Plan and Supplementary Planning Guidance can also be viewed in full on the Policies page of Pembrokeshire Coast National Park website at

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

### **National Planning Policy and Guidance**

- Planning Policy Wales (Edition 5) (specifically paragraphs 5.5.6 and 12.5 to 12.7)
- Technical Advice Note 5 – Nature, Conservation and Planning (September 2009)
- Technical Advice Note 6 – Planning for Sustainable Rural Communities (July 2010)
- Technical Advice Note 11 – Noise (October 1997)
- Technical Advice Note 12 – Design (June 2009)
- Technical Advice Note 15 – Development and Flood Risk (July 2004)
- Technical Advice Note 21 – Waste (November 2001)

- Technical Advice Note 18 – Transport (March 2007)

#### Local Planning Policy and Guidance

- Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010)

#### **Policy 1 - National Park purposes and duty**

Development within the National Park must be compatible with:

- a) the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the Park, and
- b) the public understanding and enjoyment of those qualities. In determining proposals, due regard will be paid to the need to foster the economic and social well-being of the local communities within the Park provided this is compatible with the statutory National Park purposes embodied in the foregoing considerations.

#### **Policy 7 – Countryside**

Outside the identified Centres of the Local Development Plan area development will only be permitted where:

- a) it constitutes sensitive filling in of small gaps or minor extensions (ie rounding off) to isolated groups of dwellings is proposed. Priority will be given to meeting affordable housing needs. Release of land will depend on the character of the surroundings, the pattern of development in the area and the accessibility to the Centres identified in the hierarchy
- b) housing for essential farming or forestry needs is proposed
- c) farm diversification including farm shops is proposed
- d) it constitutes the conversion of appropriate buildings to a range of uses with affordable housing<sup>85</sup> being given priority in residential conversions. Conversion must not result in unacceptable impacts upon the structure, form, character or setting of the building. The conversion of buildings that are obtrusively located in the landscape will not be permitted. Accessibility to the Centres will be an important consideration.
- e) Tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential - see Policy 35
- f) The enhancement of community facilities is proposed
- g) The proposal constitutes low impact development making a positive contribution – see Policy 47
- h) New farm buildings are justified for agricultural purposes. Traffic impact analysis will be an important consideration in proposals – see Policy 52.

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### **Policy 8 - Special Qualities**

The special qualities of the Pembrokeshire Coast National Park will be protected and enhanced.

The priorities will be to ensure that:

- a) The sense of remoteness and tranquillity is not lost and is wherever possible enhanced – see Policy 9.
- b) The identity and character of towns and villages is not lost through coalescence and ribboning of development or through the poor design and layout of development. The identification of Green Wedges will assist in achieving this priority.
- c) The pattern and diversity of the landscape is protected and enhanced – see Policy 14 and Policy 15.
- d) The historic environment is protected and where possible enhanced
- e) Development restores or wherever possible enhances the National Park's ecosystems. The protection of links between sites or the creation of links where sites have become isolated is of particular importance – see Policy 10 and Policy 11.
- f) Development which would damage or destroy Geological Conservation Review sites or any other important geological resource is not permitted.
- g) Local biodiversity action plan species and habitats are protected for their amenity, landscape and biodiversity value – see Policy 11.
- h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park – see Policy 12.
- i) Development of the undeveloped coast is avoided and sites within stretches of the developed coast are protected for uses that need.

### **Policy 9 – Light Pollution**

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

- a) where the lighting proposed relates to its purpose; and,
- b) where there is not a significant adverse affect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky.

### **Policy 11 – Protection of Biodiversity**

Development that would disturb or otherwise harm protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species including Local Biodiversity Action Plan species and habitats will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures.

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**Policy 15 - Conservation of the Pembrokeshire Coast National Park**

Development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

- a) causing significant visual intrusion; and/or,
- b) being insensitively and unsympathetically sited within the landscape; and/or
- c) introducing or intensifying a use which is incompatible with its location; and/or
- d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or
- e) losing or failing to incorporate important traditional features.

**Policy 27 – Local Waste Management Facilities**

Local waste management and recycling facilities which serve only the National Park area will be permitted provided:

- a) the site would be conveniently located in relation to the needs of the National Park community; or
- b) they are located at existing waste management sites or B2 industrial units; and
- c) the proposal makes provision for adequate screening so as to minimise any adverse effects; and
- d) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and
- e) the development will not cause demonstrable harm to the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, litter, odour nor adversely affect existing surface and groundwater resources.

**Policy 29 - Sustainable Design**

All proposals for development will be expected to demonstrate an integrated approach to design and construction, and will be required to be well designed in terms of:

- a) Place and local distinctiveness (see Policy 8)
- b) Environment and biodiversity(see Policy 8)
- c) Community cohesion and health(see Policy 30)
- d) Accessibility(see Policy 52)
- e) Energy use
- f) Energy generation (see Policy 33)
- g) Materials and resources (see Policy 31)
- h) Water and drainage (see Policy 32)
- i) Waste (see Policy 31)
- j) Resilience to climate change

Where planning applications are made to extend buildings energy, water and

drainage efficiency improvements will be sought in the original building as well as in the extension where appropriate and practicable.

### **Policy 30 - Amenity**

Development will not be permitted where it has an unacceptable impact on amenity, particularly where:

- a) the development is for a use inappropriate for where people live or visit; and/or
- b) the development is of a scale incompatible with its surroundings; and/or
- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or
- d) the development is visually intrusive.

### **Policy 31 - Minimising Waste**

Development must minimise, re-use and recycle waste generated during demolition and construction and provide waste management facilities of an appropriate type and scale as an integral part of the development.

### **Policy 32 – Surface Water Drainage**

Development will be required to incorporate sustainable drainage systems for the disposal of surface water on site.

### **Policy 42 – Employment Sites & Live/Work Units**

Employment opportunities will be provided and safeguarded through:

- a) Small scale employment opportunities are identified at St Davids.
- b) Directing small-scale employment proposals to appropriate locations in the Local Development Plan's identified Centres or buildings suitable for conversion in the Countryside (See Policy 7d). Farm diversification can also assist. (See Policy 7c)
- c) Combining business uses with other uses such as community facilities or housing including live/work units. Sites are identified at Newport and St Davids. There are also mixed use developments proposed at Tenby, Saundersfoot and Broad Haven. Employment and mixed allocations listed in Table 3 below are shown on the Proposals Map.
- d) Protecting existing employment sites for employment use except in locations where the current use is not suited to the area or there is adequate provision already or the existing use is unviable. When considering a new use for a redundant employment site a community facility or affordable housing provision will be given priority. (See Policy 43)
- e) Protecting and enhancing the working harbours at Tenby, Saundersfoot,

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Solva and Porthgain. (See Policy 18)

### **Policy 52 – Sustainable Transport**

To ensure that during the Local Development Plan period land use planning opportunities are taken to improve and promote accessibility and reduce the need to travel by car by:

- a) Permitting proposals that assist in delivering improved traffic and parking management;
- b) Permitting facilities to improve public transport by helping to link between travel modes or providing facilities for passengers;
- c) Ensuring new development is well designed by providing appropriate access for pedestrians, cyclists, vehicles; and
- d) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (see Policy 53).

Allocations for road and cycle schemes are listed in Table 10 and shown on the Proposals Map

### **Policy 53 – Impacts of Traffic**

Development will be permitted where appropriate access can be achieved. Instances where access will be considered to be inappropriate are:

- a) traffic is likely to generate an unacceptable impact on congested areas or at times of peak traffic flows; or
- b) traffic is likely to be generated at inappropriate times such as late at night in residential areas; or
- c) where there is an unacceptable impact on road safety; or
- d) where significant environmental damage would be caused and cannot be mitigated.

### Pembrokeshire Coast National Park Supplementary Planning Guidance

- Landscape Character Assessment Supplementary Planning Guidance (Adopted 22 June 2011)
- Sustainable Design Supplementary Planning Guidance (Adopted 22 June 2011)
- Land Instability – Former Coal Workings Supplementary Planning Guidance (Adopted 22 June 2011)
- Parking Standards Supplementary Planning Guidance (Adopted 22 June 2011)
- Historic Environment (Archaeology) Supplementary Planning Guidance (Adopted 22 June 2011)

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**Officer's Appraisal:****Background**

This application has been submitted by Pembrokeshire County Council following a request for a screening opinion as to the need for an Environmental Impact Assessment submitted in April 2012, pre-application discussions initiated in May 2012 and a consultation exercise undertaken by Pembrokeshire County Council in the immediate locality between July and August 2012. The County Council has submitted a 'Public Consultation Report' as part of this application.

The screening opinion issued by the National Park Authority on 3<sup>rd</sup> May 2012 concluded that the proposed development did not require an Environmental Impact Assessment although it identified the material environmental issues which would need to be addressed through a formal application. For clarity the framework for this decision is set out below:

*Environmental Impact Assessment Regulations*

Environmental Impact Assessment (EIA) is a process and can be seen as a technique for the systematic compilation of expert quantitative analysis and qualitative assessment of a project's environmental effects, and the presentation of results and consideration of mitigation before a planning application decision is taken.

It derives from European Directive 85/337/EC with the fundamental purpose as expressed in Article 2(1) as those projects '*likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects*'.

The main vehicle for the implementation of the Directive in Wales is The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The Regulations identify precisely which type of developments must be subject to EIA and also those which could be subject to the Regulations. The Regulations apply to two separate lists of projects:

- i. Schedule 1 projects where EIA is required as being mandatory;
- ii. Schedule 2 projects where EIA is required only if the particular project in question is judged to give rise to significant environmental effects on the environment .

A screening opinion was issued by the Authority on 3<sup>rd</sup> May 2012 following a request received on 18<sup>th</sup> April 2012 which concluded that the proposed development did not require an Environmental Impact Assessment although it identified the material environmental issues which would need to be addressed through an application (NP/12/0207).

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In the Regulations the issue of 'significant environmental effects' is considered by reference to a list of criteria and thresholds. In respect of this proposal for a Civic Amenity and Recycling Centre it can be noted that it is not within the list of Schedule 1 developments. As such there is a need to consider Schedule 2 and the applicable thresholds and criteria. This particular project can be described as 'an installation for the disposal of waste' and as such comes within paragraph 11 of Schedule 2 (not paragraph 3 as incorrectly referred to on screening opinion NP/12/0207). As the site lies within a 'Sensitive Area' i.e. National Park this project has been considered under the Regulations.

The requirement of an EIA has been measured against the three criteria noted in Welsh Office Circular 11/99 – Environmental Impact Assessment. These are major developments which are of more than local significance, developments which are proposed for particularly environmentally sensitive or vulnerable locations and developments with unusually complex and potentially hazardous environmental effects.:-

1. Major developments which are of more than local significance.

Whilst the scheme is defined as a 'Waste development' and is therefore labelled a 'Major Development' under the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 this does not naturally follow that the development is of any more than local significance. The scheme is for a Civic Amenity and Recycling Centre which occupies a site area of 0.90ha within an application site of 1.7ha. It is located along the boundary of the National Park with the County Council area although the site area itself does not contain any further designations. Its form and scale is similar to existing civic amenity sites within Pembrokeshire and as such it is no more than local significance.

2. Developments which are proposed for particularly environmentally sensitive or vulnerable locations.

The Circular identifies that the relationship between a proposed development and its location is a crucial consideration. The more environmentally sensitive the location, the more likely it is that the effects will be significant and require EIA. Given that the site lies within a National Park (a sensitive area) then the thresholds/criteria listed within the second column of Schedule 2 do not apply. As such screening is mandatory and consideration must be given to whether the scheme would give rise to significant environmental effects.

Whilst the site is located within the National Park the proposed site is not known to be particularly environmentally sensitive or in an environmentally vulnerable location. Indeed Planning Policy Wales (Edition 5, November 2012) identifies that the fact that a development would affect a sensitive area would not, of itself, justify the requirement for EIA although it would increase the possibility of EIA being required. Paragraph 5.5.9 states that judgement must be

taken on the particular merits of each case. Local planning authorities should consult CCW (now Natural Resources Wales) if uncertain about the significance of a project's likely effect on the environment. Furthermore in relation to sensitive areas the Circular, at paragraph 38, states that it does not follow that every Schedule 2 development in (or affecting) sensitive areas will automatically require EIA. Each case will be judged on its likely effects on the environment and also any views expressed by consultation bodies should be taken into account.

In this instance the Authority previously consulted CCW and has consulted Natural Resources Wales on the current scheme. As part of the screening opinion CCW considered that the development would unlikely impact on nature conservation features of interest in the area, however, due to its size, recommended the project was screened for any potential impact on bats. The application has been supported with an ecological study and no objection raised on such matters by Natural Resources Wales

3. Developments with unusually complex and potentially hazardous environmental effects.

Finally, on the last consideration whilst this is a waste recycling proposal it is not considered to have unusually complex and potentially hazardous environmental effects. The scheme does involve the recycling of waste although geared towards small quantities of building and construction waste from small scale DIY projects carried out by members of the public as well as some larger individual projects. Skips and igloos are proposed within the site for these purposes. General waste would be accepted although this is proposed to be stored within sealed containers. The site would operate in accordance with a Site Waste Management Licence to be obtained through Natural Resources Wales. In terms of scale and based on the catchment area it is estimated within the submission that the maximum quantity of waste accepted per annum would be 5,000 tonnes and the maximum vehicle size allowed entry to the site will be 3.5 tonnes.

It is also relevant to consider the wording contained within Circular 11/99 as to whether installations for the disposal of waste would likely require EIA. The circular states;

*"The likelihood of significant effects will generally depend on the scale of the development and the nature of the potential impact in terms of discharges, emissions or odour. For installations (including landfill sites) for the deposit, recovery and/or disposal of household, industrial and/or commercial wastes (as defined by the Controlled Waste Regulations 1992) EIA is more likely to be required where new capacity is created to hold more than 50,000 tonnes per year, or to hold waste on a site of 10 hectares or more. Sites taking*

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*smaller quantities of these wastes, sites seeking only to accept inert wastes (demolition rubble etc.) or Civic Amenity sites, are unlikely to require EIA."*

*(Circular 11/99 Environmental Impact Assessment (EIA), 1999, Annex A, paragraph A36)*

The application form submitted states that the maximum annual operational throughput would be 6,500 tonnes as part of a household amenity site. The guidance suggests that Civic Amenity sites are unlikely to require EIA and the scheme submitted is not a case which gives rise to any significant environmental effects for which an EIA would be necessary and this is demonstrated in the response received from Natural Resources Wales and the former CCW. The decision was therefore that no EIA was required on this occasion.

Following this decision, an officer met the applicant's agent in May 2012 to discuss the potential proposals and the policy context. The officer identified the type of key considerations which would be relevant in a future application and the level of information needed to support an application. A further meeting took place in August 2012 to discuss the scheme. Officers identified that sufficient feasibility would need to be provided to explain the site selection process as well as key material planning considerations and suggested that public consultation be considered.

With regard to public consultation the applicant undertook a series of targeted pre-application consultations with the local community. These involved meetings in July 2012 with Local Council Members and local residents, a presentation event with local residents and town and community council representatives and additional meetings with interested parties.

A second stage of public consultation was undertaken with the aim of consulting with a wider range of interested parties, including those who had not necessarily been involved in initial consultation. An information booklet was produced to inform an event held in the locality on 22<sup>nd</sup> August 2012. A press release was also distributed to local media outlets

A briefing note was produced by Pembrokeshire County Council and through the submitted Consultation Report we are advised has circulated to relevant stakeholders including Age Cymru, Older People's Commissioner for Wales, Alzheimer's Society Wales, Mind Cymru, Minister for the Environment and Sustainable Development, Minister for Health and Social Services, Regional AM's, Constituency AM's and Constituency Member of Parliament to ensure clear awareness and understanding of the proposal.

## **History**

With regard to site history there have been 2 No. planning applications made on the land in recent years. In 2000 the Authority approved a change of use of part of the land to a nature walk. An application followed in 2005 for a toilet facility although this was refused permission on the basis that it was an

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unacceptable form of development in the open countryside and that it was out of character with the surrounding area. The history is as follows;

NP/05/347 – Lower Hopshill Farm, Saundersfoot – Toilet Facilities for Walkers – Refused – 26 September 2005

NP/00/326 - Lower Hopshill Farm, Saundersfoot – Change of use of part of the farm to nature walk – Approved – 28 September 2000

### **Constraints**

- Biodiversity Issue
- Coal Referral Area
- Coal Standing Advice Area

### **Current Proposal**

The application proposes the construction of a Civic Amenity and Recycling Centre on land adjoining and to the west of Brooklands Nursing Home. At present the site comprises a large open area of rough grassland with surrounding areas of woodland and other vegetation.

The scheme involves the provision of a range of waste management facilities to be contained within a central operating area and served by a public access road directly from the A478 which abuts the south boundary of the application site. The purpose is to provide a waste management facility for the collection and segregation of municipal refuse, serving the National Park Authority as well as the County Council area. The applicants explain that the primary objective of the facility is to provide separate containment facilities for segregating recyclable materials from waste that will be disposed to landfill.

Notes accompanying the application state that Civic Amenity Sites are designed to make it easy for the general public to dispose of and recycle their everyday waste. The proposed facility would cater for general householder residual waste (waste that has had all the recyclable materials taken out of it) which will be compacted and stored in an enclosed sealed container. The site would also handle materials that are sent away for recycling including steel and aluminium cans, green garden waste, paper, glass bottles, mattresses, carpets, electrical items and white goods. It would also deal with wastes that fall under the definition of 'hazardous waste' which includes paints, oils, fluorescent tubes and batteries.

In terms of management any residual waste that enters the site will be compacted and kept in enclosed sealed containers under a proposed canopy. These waste containers are proposed to be removed from the site several times a week.

The proposed Civic Amenity and Recycling Centre comprises the following components;

- Weighbridge facility area;
- Widened site access;
- Site access roads and dedicated parking bays;
- 9 large open topped containers;
- 1 trailer type container;
- 1 self-contained compacting container and 1 closed top skip for public service wastes;
- Compaction skip shed;
- Canopy shed for dry recyclables;
- 4 small skips for glass and cans;
- 5 container skips in public access areas;
- 5 small igloos;
- Welfare office;
- Staff and visitor car parking (34No. Spaces);
- Quarantine area for the temporary storage of any unlicensed materials;
- Perimeter and internal site fencing;
- Lighting, signage and CCTV;
- Landscaping scheme;

#### Access

Plans show that the site would be accessed through the existing access to the south east of the application boundary. An internal road would lead to an internal access comprising 2.4m high steel palisade site gates. Public vehicles accessing the site would pass a weighbridge area and a tarmaced access would run in a circular route around the site. Dedicated parking bays are set alongside the internal access route and the public area would be separated from the internal operational area by a split level. The change in level would be formed by reinforced concrete retaining walls and would allow public users to place materials into skips at a lower level.

#### Canopy

A canopy is proposed along the south boundary of the site. This is proposed to house dry recyclables in 5 bays. The canopy measures 16m across with a depth of 4.3 and height of 4.6m. The canopy is a steel structure and proposed to have a galvanised finish in cladding painted dark green.

#### Compactor Shed

The compactor shed is proposed to be sited to the west of the site and comprise of a steel framed canopy to house a compactor and compactor skips. The shed measures 20.5m in length, 13.75m in depth and approximately 6m in height. The structure is proposed to have a galvanised finish with corrugated cladding to the roof and walls. Sheeting, flashings, gutters and downpipes would be dark green in colour.

#### Welfare Facilities

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A single steel container to be fitted out internally with an office space, toilet and washing facilities is proposed to be sited on entry within the site. This measures 7.3m in length and 2.75m in width upto a total height of 2.6m.

### Landscaping

A Landscaping Scheme has been submitted to support the application.

The scheme proposes retention of existing landscaping and addition of further planting to serve the site. The existing bund to the front of the site is proposed to be planted with a mix of native woody species. This includes 40-60cm tall and 3m – 4m tall root-balled trees planted at strategic locations to maximise screening.

Two 1m high bunds are proposed along the east boundary of the site with planting consisting of trees and shrubs. Scots Pine, Holly, Beech, European Larch and Welsh Oak trees are proposed along with Hazel, Dogwood, Blackthorn, Goat Willow and Gorse shrubs.

Proposals also include all new embankments along the west boundary to be topsoiled with material stripped from the site and seeded with flowering meadow mix. Existing woodland and meadow to the north boundary of the site is proposed to remain unaffected by the proposals and 898m<sup>2</sup> of hardcore path near the east of the site is proposed to be excavated to a depth of 200mm and replaced with topsoil from the site.

### Signage/Lighting/Security

Two information signs are proposed to be erected on entry to the site. External lighting is designed within the site comprising of 9 lighting columns positioned along the edge of the perimeter access road (however plans show the provision of 10 lighting columns) and a further 4 lights sited on the compactor shed. The lighting columns proposed measure 8m high and comprised of an aluminium finish. 2.4m high steel palisade fencing is proposed along the boundary of the site and CCTV units are also proposed to be installed.

### Estimated Vehicle Movements

In relation to additional traffic and transport movements the supporting information states that the new development will have approximately 340 vehicles a day using it, in addition to 3 Heavy Goods Vehicles taking waste from the site.

The maximum vehicle size allowed into the site will be 3.5 tonne and a height restriction is proposed to be put in place by a barrier set back from the site entrance at a height of 2m. Based on the catchment area of the site it is estimated that the maximum quantity of waste accepted per annum at the site will be around 5,000 tonnes

Operational Throughput

The planning application form identifies the annual operational throughput as being;

Household Civic Amenity	6,500 tonnes
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Openings Hours

The site is proposed to be open to the public during the following hours 7 days a week:

1 April – 30 September	8am – 6pm
1 October – 31 March	8am – 4pm

In relation to operational hours the following hours are proposed

1 April – 30 September	6.30am – 7.30pm
1 October – 31 March	6.30am – 7.30pm

The application has been supported with the following documentation and details of which are available to inspect at the National Park Authority offices;

- Design and Access Statement
- Environmental Report
- Planning Report
- Coal Mining Risk Assessment Report
- Transport Statement
- Public Consultation Report
- Proposed Drainage System

**Key Issues**

The application raises the following key planning matters:-

- Policy and Principle of Development
  - European Legislation
  - National Policy
  - Regional Policy
  - Local Policy
- Site Selection Process
- Visual Amenity and Special Qualities of the National Park
- Neighbouring Amenity and Privacy
- Access, Highway Safety and Parking
- Archaeological Conservation
- Land Drainage and Flood Risk
- Biodiversity
- Land Stability
- Other Material Considerations

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### **Policy and Principle of Development**

Firstly it is considered relevant to understand the policy surrounding the management of waste development and their origin. Below consideration is given to European, National, Regional and Local Policies.

#### **European Legislation**

It can be found in legislation that many of the principles for the management and treatment of waste originate from Europe. The revised Waste Framework Directive (November 2008) (rWFD) sets out a priority order which it refers to as a Waste Hierarchy. This puts waste prevention at the very top followed by preparation for re-use, recycling, recovery (including efficient energy recovery from thermal treatment) and finally disposal to landfill (which also includes inefficient energy recovery). Member states must have regard to this in the development of policy. The Directive also sets targets for the re-use (including preparation for re-use) and recycling of priority materials (defined as paper, glass, metal and plastic from households and similar waste streams) – 50% by weight by 2020. The revised Directive was transposed into UK law by the Waste (England and Wales) Regulations 2011. There is also a target for non-hazardous construction and demolition waste of 70% re-use/recycling by 2020. The Directive also introduces the principles of proximity and regional self-sufficiency.

The revised Waste Framework Directive also requires member states to establish waste management plans over their entire geographical area and to have a strategy within those plans for the implementation of the requirements of the EU Landfill Directive – the reduction of biodegradable waste going to landfill. The targets set out in the Landfill Directive are to reduce the amount of biodegradable municipal waste going to landfill by 25% by 2010, 50% by 2013 and 65% by 2020 (base year of 1995). The Landfill Directive also includes a requirement to pre-treat all waste prior to entering landfill. This is the basis for the Regional Waste Plans.

#### **National Policy**

On a general level Planning Policy Wales Edition 5 requires that major developments should not take place in National Parks except in exceptional circumstances. This may arise, where, after rigorous examination, there is demonstrated to be an overriding public need and refusal would be severely detrimental to the local economy and there is no potential for locating the development elsewhere or meeting the need in some other way. Any construction and restoration must be carried out to high environmental standards. Consideration of such applications should therefore include an assessment of the need for the development, in terms of national considerations, and the impact of permitting it or refusing it upon the local economy; the cost and scope for providing the development outside the designated area or meeting the need for it in some other way, and an

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assessment of any detrimental effect on the environment and the landscape and the extent to which that can be moderated.

With regard to waste national policy, in order to set out a roadmap towards achieving the targets set out in the Landfill Directive the Welsh Government introduced a Landfill Allowance Scheme which sets out the maximum amount of biodegradable municipal waste each Council can landfill each year. There is a potential penalty of £200 per tonne if the limit is exceeded. The current Landfill Allowance for Pembrokeshire is 18,667 tonnes in 2013-14 and this reduces annually to 13,689 by 2019-20. Therefore, year on year the Local Authority has to reduce the amount of Biodegradable municipal waste sent to landfill. One of the ways of doing this is to reduce the waste generated but also to provide more facilities and collection networks so as to divert recoverable waste from landfill.

The National Planning Policy context is clearly set out in Planning Policy Wales (Edition 5, November 2012) paragraphs 12.5 to 12.7 supplemented by the guidance contained in Technical Advice Note 21 – Waste (November 2001). It is of relevance that there is a consultation currently ongoing in respect of a revision to TAN 21 with a revised draft document published for consultation in March 2013.

The Policy explains that a sustainable approach to waste management will require greater emphasis on reduction, re-use and recovery and less reliance on disposal without recovery and that waste should be managed (or disposed of) as close to the point of its generation as possible, in line with the proximity principle. This is to ensure, as far as is practicable, that waste is not exported to other regions.

In relation to development management Planning Policy Wales (Edition 5, November 2012) paragraph 12.7.1 states;

*“Decisions on planning applications should have regard to the waste management objectives in the national waste strategy. The environmental impact of proposals for waste management facilities must be adequately assessed, supported by independent surveys where appropriate, to determine whether a planning application is acceptable and, if the adverse impacts on amenity cannot be mitigated, planning permission should be refused. Adequate facilities for the collection, composting and recycling of waste materials should be incorporated into the design of any major development.”*

In Technical Advice Note 21 - Waste the Welsh Government subscribe to a waste hierarchy (as set out in the rWFD) as a general guide to advise decisions on waste management options. TAN 21 also sets out in Annex C the matters that Local Planning Authority's should take into account when considering waste planning applications. TAN 21 also introduced the requirement for Regional Waste Plans – North, South East and South West Wales.

In Towards Zero Waste – the Overarching Waste Strategy Document for Wales (June 2010) Welsh Government sets out its target of achieving zero

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waste by 2050 and recycling rates of a minimum of 70% across all sectors by 2025. Minimum levels of re-use and recycling/composting of municipal waste are set for intermediate years of 52% by 2012/13, 58% by 2015/16, 64% by 2019/20 with a maximum of 10% of municipal waste landfilled by 2020 and a maximum of 5% by 2025. In 2010/11 Pembrokeshire diverted 49% of its municipal waste to recycling, composting and re-use so there was still some way to go to achieve the 52% target in 2012/13 let alone the 58% target by 2015/16 especially as all the easy options have already been taken. Every percent from now on is going to get that much more difficult to achieve.

The strategy document Towards Zero Waste was intended to be supported by a suite of Sector Plans. One of the Sector Plans was the CIMS (Collections, Infrastructure & Markets Sector Plan) which has been produced (some of the others have not). The CIMS Plan is a lengthy document which deals with how the Welsh Government intends to set about meeting the targets set out in Towards Zero Waste. The Waste (Wales) Measure 2010 made the targets for recycling/composting included in Towards Zero Waste a statutory requirement for LPA's.

### Regional Policy

The waste hierarchy is one of four key principles that underpin the South West Wales Regional Waste Plan - 1<sup>st</sup> Review (August 2008), the others being regional self-sufficiency, the proximity principle (dealing with waste as close to the source of production as possible) and sustainability. The objective of the South West Wales Regional Waste Plan is to assist in ensuring National and International (EU) obligations relating to waste can be met and it provides a regional framework which was intended to assist in the development of Local Development Plans. The Regional Waste Plans are a requirement of the current TAN21 but it is anticipated that the revision of TAN21 and PPW paragraphs 12.5 to 12.7 will dispense with the requirement for these Plans. In fact the Regional Waste Plans are already outdated and have been largely overtaken by Welsh Government initiatives such as the Waste Procurement Programme (food waste and residual waste programmes) and policy such as Towards Zero Waste and the accompanying Sector Plans

The Regional Waste Plans are primarily still in place due to the spatial dimension contained within them which is Welsh Government's defence against infraction proceedings for non-compliance with the revised Waste Framework Directive requirement for waste management plans across the entire geographical area. The Regional Waste Plan outlined a framework whereby there is an aspiration to achieve the 2020 targets contained in the Landfill Directive by 2013. This is a very ambitious target and requires a significant shift away from landfill towards recycling/composting.

The Regional Waste Plan introduced a spatial dimension by producing an Areas of Search Map which was intended to be used at a strategic level by Local Planning Authority's in Local Development Plan preparation as a starting point to more detailed local level assessments and were not to be

used to determine the appropriateness of proposals for individual waste management facilities. Areas of Search were categorised from 1 to 4. Notwithstanding that, National Parks were automatically defined as exclusion areas in the maps showing the Areas of Search for facilities serving more than one area. The proposed facility does not appear to be of a scale which serves an area any greater than Pembrokeshire and in that case the Areas of Search would not apply. In any event the Pembrokeshire Coast National Park Authority Local Development Plan would have had to have regard to the requirement of the Regional Waste Plan.

The Regional Waste Plan refers to National Park issues in paragraph L7 on Page 159. This confirms that National Park Authorities are exclusion zones for the purposes of the Areas of Search and sets out two options for planning for new facilities for the management of National Park Authority waste arisings – new facilities serving the National Park Authority area only or facilities to serve a wider area to be sited outside the National Park Authority.

### Local Policy

The Local Development Plan states in its Vision & Objectives that one of the key outcomes it is seeking is the provision of waste facilities to cater for National Park generated needs or to work with the County Council to provide waste facilities outside the National Park which serve both areas.

Policy 27 – Local Waste Management Facilities provides the Policy context in terms of a criteria based policy. Paragraph 4.122 in the supporting text refers to Civic Amenity Sites and states that they serve a useful purpose but also highlight potential access, parking and amenity issues. The paragraph reads;

*“Civic amenity sites serve a useful purpose in that household waste can be sorted to facilitate reuse and recycling. It also helps to avoid fly tipping. They may generate significant vehicle movements and will involve temporary storage of waste materials in open topped or closed (for putrescible waste) containers. For these reasons, the requirements with respect to access, parking and amenity are quite stringent. There are also environmental permits separate to the planning system that need to be considered.”*

*(Local Development Plan, paragraph 4.122, Page 52)*

In view of this Policy 30 which deals with general amenity considerations and Policy 53 which deals with traffic and highway matters of the Local Development Plan will be especially relevant in this case.

Paragraph 1.28 of Appendix 1 of the Local Development Plan also sets the context for the development of the policy position. This reads;

*“The National Park is part of the South West Wales Regional Waste Plan Group. Implications for this National Park Authority are that:*

- *National Park Authorities are automatically identified as exclusion areas in the maps showing areas of search for facilities to serve the*

*needs of the region.*

- *National Park Authorities have no requirements to provide for the needs of the region.*
- *Given that National Parks are automatically identified as exclusion areas for facilities serving more than one authority area, National Park Authorities have the following two options for planning new facilities for the management of National Park waste arisings:*
  - *National Park Authorities may plan for new facilities serving only the National Park area to be sited within the National Park area; and*
  - *National Park Authorities and Unitary Authorities which cover the same area may work closely together to plan for new facilities serving both the National Park Authority and Unitary Authority areas to be sited outside the National Park. The provision of data on capacity broken down by Unitary Authority area facilitates this arrangement"*

*(Local Development Plan, Appendix 1, paragraph 1.28, Page 103)*

These two options suggests that National Park Authorities may plan for new facilities to serve only the National Park or that both National Park Authorities and Unitary Authorities which cover the same area may work closely together to plan for new facilities to serve both. Further to this paragraph 4.120 appears to accept that the existing Civic Amenity Site located within the National Park area at The Salterns in Tenby can be redeveloped OR replaced elsewhere within the National Park provided that the criteria a) to e) of Policy 15 are met. Policy 15 deals with the Conservation of the National Park whereas Policy 27 is more specific to Local Waste Management Facilities.

Paragraph 4.120 reads as follows;

*"Discussions have taken place with Pembrokeshire County Council. Whilst there is a requirement for redevelopment of the Tenby civic amenity site, and a desire to establish a larger facility with improved customer access, better traffic management and a wider range of facilities in the area, no firm proposals are in place. In light of this, a criteria based policy is provided. It is also recognised that the existing civic amenity site at Tenby, although predominantly serving National Park communities, also serves communities outside of the National Park, at Kilgetty and Narberth. The National Park Authority would therefore, as an exception to Policy 15 and the South West Wales Regional Waste Plan 1st Review, consider retaining the relocated enlarged facility within the National Park provided that criteria a) to e) of Policy 15 are met. This is on the understanding that the facility would still predominantly serve the National Park area. The existing Civic Amenity Site at St Davids also serves communities outside the National Park. Future redevelopment proposals for this site will be considered as an exception to*

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*Policy 27 provided the site continues to predominantly serve the National Park communities. The Municipal Waste Strategy is currently being reviewed by Pembrokeshire County Council, which is the waste collection and waste disposal authority. Mini bring sites, especially bottle banks are being positively explored. Any requirement identified for the National Park will be considered against relevant criteria based policy."*

*(Local Development Plan, paragraph 4.120, Page 103)*

For clarification purposes it is firstly relevant to note that there is a typographical error on line 7 in that the sentence should refer to there being 'an exception to Policy 27' and not to Policy 15. This error has been amended in the Local Development Plan Erratum.

The key concept to gather from this supporting text is that the principle of the 'redevelopment' or 'relocation' of the Tenby Salterns Civic Amenity Site would be supported (as an exception to Policy 27 and the South West Wales Regional Waste Plan 1<sup>st</sup> Review) provided that it would still 'predominantly' serve the National Park Area. The key question from a policy perspective is therefore whether this is a facility to cater primarily for National Park generated needs as if it is to cater for the wider needs of the Park and Pembrokeshire then the policy position would appear to suggest that such sites should be located outside of the National Park. This would also be consistent with national policy advice in respect of locating "major" developments outside the National Park except in exceptional circumstances.

There is no definition contained within the Local Development Plan of the word 'predominantly' although it is generally accepted that this relates to 'mainly or for the most part'. In this context it is considered that for the site to cater predominantly for the National Park area that the Civic Amenity Site would need to serve more than 50% of the National Park Area.

The submitted 'Planning Statement' states that based on the distribution of dwellings in the Local Land and Property Gazetteer and the 2011 Census data for the output areas, a total number of 8,119 households are found within the catchment area. Of these numbers the document states that 4,366 (53.8%) reside within the area of the National Park and 3,753 (47.2%) outside the National Park within other areas of the County Council.

A figure has been produced in the document to show the catchment area for residential dwellings to be served by the proposed site and this is shown in Appendix 3 of the Planning Statement submitted as part of the application. This suggests that the proposed Civic Amenity Site will serve the areas of Amroth, Lampeter Velfrey (part of), Templeton, Kilgetty/Begelly, Jeffreyton (part of), Carew (part of), East Williamston, Saundersfoot, St Mary Out Liberty, St Florence, Tenby, Penally and Manorbier.

However what is apparent from the figure produced is that Narberth is not identified as being a settlement to be served by the relocated facility. In an earlier section of the 'Planning Report' the applicants identified that Narberth

would be served by an improved waste management facility stated under the heading 'Development Need' (page 12);

*“the underlying need for a Civic Amenity and Recycling Centre within the area is to provide a sustainable management solution for processing and recycling of public municipal wastes, through the provision of an improved waste management facility. This is required to serve South East Pembrokeshire, including the main towns of Tenby/Saundersfoot, Kilgetty/Begelly and Narberth, as well as surrounding areas”.*

It is not clear from the information provided therefore where householders from Narberth would go for waste recycling purposes if not to this proposed site. The nearest existing Civic Amenity Sites to Narberth in Pembrokeshire are the Salterns to the south, Hermon to the North and Winsel to the West. The proposed site appears to be the most logical and nearest site to the residents of Narberth by virtue of its location off the A478.

Without official data it is difficult to establish the precise number of households to be served at Narberth although it is clear that the population of Narberth coupled with the general household growth rate of just over 5.5% in the County Council area and just over 1% in the National Park would result in a lower proportion of households within the catchment area being located within the National Park.

It is understood that the population of Narberth is significantly greater than 613 which is the difference between the number of household areas inside the National Park (4,366) and those outside (3,753) and which would be served by this site. As such the inclusion of Narberth would result in the majority of households being served by the Civic Amenity Site residing outside of the National Park Area.

In view of this it can be concluded that there is insufficient information to determine that the proposed scheme will predominantly serve the National Park. As such the scheme must fall to be judged against Policy 27.

Policy 27 makes provision for local waste management facilities in the National Park on the provision that they serve only the National Park area. Additional criteria including the need for the site to be located conveniently in relation to the needs of the National Park community or being located at an existing waste management site or B2 industrial unit and introducing adequate screening, being a sufficient distance from neighbouring properties and not causing demonstrable harm to the amenities of the local area with regard to access, traffic generated, noise, vibration, dust, litter, odour not adversely affecting existing surface and groundwater resources.

From the application submitted it is clear that the site would not only serve the National Park area but that it would also serve areas outside the National Park. Notwithstanding the explanatory text, which has been considered above, the application fails to meet the fundamental aims of the policy. Whilst it may be argued that the site would be conveniently located in relation to the

needs of the National Park, being only a short distance from the existing Salterns site, in relation to criterion (a) of the policy it is clear that the site lies in a countryside location and not at an existing waste management site or B2 industrial unit, being the location requirements of the policy.

In view of the above it can be concluded that insufficient information has been provided to conclusively demonstrate that the proposed site for a Civic Amenity & Recycling Centre will serve predominantly the National Park Area in line with the aims of paragraph 4.120 of the Local Development Plan. As such the scheme falls to be considered against Policy 27 (Local Waste Management Facilities) and fails to meet the aims and requirements of this Policy.

### **Site Selection Process**

Notwithstanding the failure to demonstrate that the site will predominantly serve communities in the National Park area it is relevant to understand the site selection process carried out as part of the application. Within the Planning Report information has been provided to demonstrate why the proposed site has come forward for development. Research was carried out by Pembrokeshire County Council over a number of years identifying there was a need for a replacement for the existing Tenby facility. A number of selection criteria were identified to inform the site selection process with the aim for the following:

- A site larger than the current facility in Tenby to permit wider segregation of different waste streams;
- A site of sufficient size to permit the effective separation of the public from operational activities to ensure the safety of users and to allow on going public use of the facility during operational activities;
- A site which offers the ability to develop a modern facility capable of serving both current and foreseeable requirements;
- A location close to centres of population in the south east of the County to encourage usage by as large a number as possible in this area;
- Complement the location of other sites across the County;
- Good site access, ideally with existing turning lanes or similar to minimise need for costly highway improvement works;
- Preferably located to the North of the current Tenby site on the A478/A477 road corridor in order to serve the communities of Saundersfoot, Kilgetty, Begelly and Templeton without detriment to Tenby residents, whilst also reducing the number of vehicles entering Tenby;

- Site availability to meet the timescales for grant funding through the European Convergence Programme;
- A separation distance of at least 100m from the operational area of the site to the nearest residential property;
- Land that is either in Council ownership or immediately available for purchase, without restriction.

Approximately 14 sites in total were considered in the initial assessment and a further 8 sites considered following consultation with the public. The sites considered are shown in the table below along with a summary of the County Council's reasons for not pursuing the site as documented in the Planning Report. Various constraining factors included concerns regarding accessibility and movement in highway terms, landowners unwilling to consider proposals, loss of woodland, proximity to housing and a number of the site being positioned within flood zones and objection being likely from the then Environment Agency. However whilst the preferred site at New Hedges was identified as being the only suitable site there is no evidence to suggest it is the only site deliverable to provide the development particularly where works could be carried out to provide the facility in a location outside the National Park in line with the aims of the South West Wales Regional Waste Strategy.

<b>Site Considered</b>	<b>Reasons for not pursuing</b>
Land at Junction of the A477 & A478, Begelly, Kilgetty Common	Entrance to trunk road meant that site would have required traffic lights not acceptable to Highway Department. Access across mature wet woodland would have been technically demanding.
Adjacent to Begelly Arms, Begelly, Kilgetty Common	Site considered unacceptable by virtue of its location within or in close proximity to flood place with the likelihood of objection being raised by Environment Agency
Between A477 and former trunk road, Begelly, Kilgetty Common	Site considered unacceptable by virtue of its location within or in close proximity to flood place with the likelihood of objection being raised by Environment Agency
Land on New Road, Begelly	Site within high risk flood area and development would be opposed by Environment Agency
Land near New Hedges Roundabout	Land owner unwilling to consider proposal and has alternative future plans for the site
Former Pentlepoir School	Discounted due to proximity to surrounding housing and the site

	would be highly visible from road
Land off Kingsmoor Road, Kilgetty	Discounted due to proximity to residential properties and its location within residential settlement limits, along with the need to provide a filter lane off the A478 and drainage issues
Land near Crane Cross	Discounted due to access considerations, with extensive works required to widen a minor road. Site not very well screened.
The Salterns	Site located in a flood risk area being potentially subject to tidal and fluvial flooding impacts. The site also being used as a park and ride facility, located adjacent to camping site and has numerous services below the site.
4 sites in New Hedges	Land owners unwilling to consider proposal as they either had alternative plans for the sites or were not interested in sale
Carew Airfield	Deemed unsuitable due to proximity to Waterloo Civic Amenity Site and located some distance from centres of population in South East Pembrokeshire
Carn Springs, Devonshire Drive	Discounted on over-riding highway concerns raised as part of an earlier grant of planning permission for a proposed Green Waste and Composting facility in 2002 which highlighted lack of capacity on the access road to accommodate high levels of traffic
Opposite junction south of Moreton	Difficulties achieving exit visibility onto highway and access would require implementation of roundabout system which would exceed cost of £250,000. Discounted on access issues.
Land adjacent to the railway line/bridge South of Moreton	Discounted due to access and forward visibility issues
Site to the North East of Crane Cross	Significant works would be required to provide improvements to existing right turn lane or provision of roundabout which would cost in excess of £250,000. Discounted due to

	access issues.
Land to the South West of Crane Cross	Concerns raised over proximity of access to the A478 in relation to the expansion of an existing caravan park and greater levels of traffic. Discounted due to access issues.
Land north of Lady Park	Would require bridging across a wooded valley. Discounted due to topography of site and loss of woodland.
Land South of A477	Likely highway objections from Trunk Agency and discounted due to access issues

(Source: Planning Statement, information extracted from Section 3.4 Site Selection)

### **Visual Amenity and Special Qualities of the National Park**

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria 'd' and 'e' resists development that would fail to harmonise with, or enhance the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion 'b') or is visually intrusive (criterion'd').

The application site is positioned along the boundary of the National Park on a key tourist route into Tenby and the surrounding tourist destinations in South Pembrokeshire. The Authority has produced a Landscape Character Assessment of the National Park and places the application site within Local Character Area (LCA) 1 – Saundersfoot Settled Coast. This LCA is the easternmost section of the National Park, running northwards from the northern outskirts of Tenby, through Saundersfoot, then north eastwards through Wiseman's Bridge, Pleasant Valley, Summerhill and Amroth to the eastern boundary of the National Park. Although quite densely settled, the rolling landform with small river valleys running to the coast and the amount of woodland cover and intervening agricultural land mean that the built form is not generally intrusive.

In terms of visual and sensory characteristics the area is defined as being a pleasant area of valleys with some visual links to the coast. It refers to wooded areas along several small valleys with streams flowing to the coast and that the valley sides are largely wooded with mixed species of trees within a wider agricultural landscape.

The application site fits into the description in that it forms an unspoilt area of agricultural land with dispersed pockets of development nearby. This includes a group of cottages, church, caravan site and shop to the west in Bethesda all of which appear to have developed along the A478. The east of the site comprises of Brooklands Nursing Home and mainly single dwellinghouses. The north of the site is characterised by surrounding farmland associated with Lower Hopshill and Hopshill Mountain farms.

Although the site is at a lower level than the adjoining highway and some views will be restricted the scheme will evidently transform the existing character of the site from that of unspoilt agricultural land into a tarmac surfaced and engineered platform. The built development and stored items for the site which include a large compactor shed, canopy structure, steel container, various skips, palisade fencing and column lighting are not readily found in the immediate locality and usually more readily associated with industrial sites and compounds.

The Authority therefore has to consider whether the type and form of development is suitable having regard to the character and appearance of the site, its surroundings and location within the National Park and the primary aims of policies 1, 7, 8, 15 and 30.

The applicant has produced an assessment of Landscape and Visual Impact and supplied an analysis of 4 viewpoints surrounding the site along with supporting photomontages. These provide photomontages of the development site at year 1 following completion of the development and at year 15 following the establishment of planting. Through the assessment the applicant accepts that there would be disruption to landscape character and visual amenity through the construction phase of the development, however, states that these effects, particularly the use of construction plant and materials storage, would be minimised by construction best practice.

The remaining analysis accepts that there will be glimpses of the development across the site with views from The Leys (a property to the west), Bethesda Cottages (properties to the West) although these views would be filtered and would diminish following the proposed hedgerow management and establishment of planting. However the establishment of planting itself is estimated to take approximately 15 years and the report does not rule out all views of the site with the report stating;

*“The A478 and adjacent hedgerows/trees will continue to form the foreground and frame limited views out to the wider landscape. Immediately following construction, oblique views of the proposed Civic Amenity and Recycling Centre would be available through the site access, set against a wooded*

*backdrop. Following the effects of proposed hedgerow management and establishment of planting (after approximately 15 years), the proposed Civic Amenity and Recycling Centre would be largely obscured for both car and bus users, with lighting columns visible against trees”.*

*(Environmental Report, page 42,)*

It is clear from the submitted photomontages that the proposed lighting columns positioned across the site will be readily visible due to their height in year 1 although the assessment refers to only 'glimpsed views' being visible and that they would be visible against trees. The supporting documents identify that 9 No. stand alone lighting columns are proposed, however, the plans mark out positions for 10 No. lighting columns around the site perimeter. Furthermore there are 4 lantern lights proposed to be affixed to the compactor shed. Each of the columns proposed stands 8m tall in height and would be positioned within the public area which lies above the operational area. With the public area set only slightly below the existing highway the columns would be positioned approximately 7.2m above the level of the existing highway. Whilst there is an existing hedgerow and additional planting is proposed the level of screening is only likely to cover between 4m and 5m above ground level as depicted on the application plans. As such even with the maturity of trees and plants following up to 15 years growth the lighting columns would remain highly visible from outside the site with between 2.2m and 3.2m of the upper portion of the lighting columns visible from the highway at ground level. Passengers travelling along the A487 by bus, coach or other high vehicles are likely to have elevated views and the lighting columns will be clearly visible.

Whilst the visibility of a development in itself is not the decisive matter what needs to be considered is whether these lighting columns would conserve or enhance the character and appearance of the National Park by not adversely affecting the qualities and special character of the National Park. The site lies in open countryside and dominated by surrounding unspoilt agricultural land. Whilst there is built development along the A478 the site is clearly one of an undeveloped nature and visible on entry into the National Park. The lighting columns would stand proud above the hedgerows, be visible from the highway and surrounding viewpoints and would not be sensitively or sympathetically sited within the landscape. They would introduce a clearly urban form of development in the countryside against the ethos of the National Park at protecting the character and appearance of the countryside from development which has an adverse impact. The lighting will cause significant visual intrusion both through the visible columns and the introduction of new lighting into an otherwise unspoilt and unlit area of countryside. Whilst being predominantly down lit the lighting will cause a significant adverse effect on the character and appearance of the area within the National Park and lose a sense of tranquillity. As such the lighting columns would be contrary to Policy 15 (Conservation of the Pembrokeshire Coast National Park) criteria a), b), c), d) and e) as well as Policy 8 (Special Qualities) criterion a) and Policy 9 (Light Pollution) criterion (b).

The largest built development on site relates to the proposed compactor shed which is positioned towards the west boundary of the site. As noted in the

submission this shed measures 20.5m in length, 13.75m in depth and approximately 6m in height. The structure is proposed to have a galvanised finish with green corrugated cladding to the roof and walls. The purpose of this facility is to provide space for the compactor and compactor skips. The second built development is the proposed canopy which lies along the south boundary of the site adjacent to the public access road within the site. The canopy proposed measures 16m across with a depth of 4.3m and height of 4.6m. This is proposed to match the compactor shed in finish in a galvanised finish and would provide space to house dry recyclables in 5 dedicated bays. Other site facilities proposed include a site office within a metal container, various skips, igloos, a height limiting barrier near the public access and palisade gates and fencing

Whilst it is accepted that these buildings provide a specialist environment within which to sort and recycle materials they are considered to be of a scale and appearance which is not of traditional design and would introduce an urban development into a countryside location. The introduction of metal fencing, metal containers and skips onto the land are furthermore not characteristic of a countryside setting.

In respect of visibility of these aspects the submitted Landscape Assessment identifies that there will be glimpses of the development following its completion and having assessed the submitted photomontages the visible aspects would appear to be mainly focused around the site entrance with the proposed site office, palisade fencing and further along the A478 there is potential to see glimpse of the buildings and their roofs. Whilst the majority of built development may potentially be screened, the submitted reports accept that this could take up to 15 years in view of the need for planting to mature. The site lies adjacent to the A478 a key entrance or gateway into the National Park which provides a significant number of visitors and residents access to Tenby, Saundersfoot and the surrounding coastal areas within the National Park. The introduction of this form of urban development into the landscape and particularly the hard lines created by the form and type of facilities will have an unacceptable impact upon the site and the special qualities of the National Park contrary to the aims of policy 15 criterion a), b), c) d) and e).

Whilst there is an existing access to and from the site the lawful use of the land remains as agricultural. In view of this the type of vehicles likely to currently be attracted to the site are farm vehicles in connection with agriculture which is expected in a countryside location. The proposed development would provide daily access to and from the site for members of the public with estimated traffic being between 340 and 348 trips a day. In addition to this the site is forecast to generate a maximum of 3 two-way daily HGV movements on the busiest day during any given week. In total the proposed facility is estimated to generate 14 two-way HGV movements during a typical week during operation. This level of access to and from the site is considerably over and above what could be expected from an agricultural use. In relation to the access it is also relevant to note that there would be proposed entrance signs positioned adjacent to the access with one sign either side positioned on a concrete plinth. The vehicle movements and

signage will have an impact upon the character and appearance of the area by virtue of changing the character and appearance of the access to cater for the industrial form of activity proposed. As such this is considered to impact detrimentally upon visual amenity in the National Park and as such is contrary to Policy 15 which aims at protecting the landscape character and special qualities of the National Park from adverse forms of development.

### **Neighbouring Amenity and Privacy**

Policies 29 and 30 of the Local Development Plan seek to protect community cohesion and health and to avoid incompatible development that would lead to a significant adverse impact upon amenity. Policy 30 explains that development will not be permitted where it has an unacceptable impact on amenity, particularly where the development is inappropriate for where people live or visit, where the development is of a scale incompatible with its surroundings, where the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact and where the development is visually intrusive. The supporting text to the policy explains;

*“this policy aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and countryside which makes for pleasant life rather than a mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity”*

*(Local Development Plan, Paragraph 4.136)*

Planning Policy Wales (Edition 5, November 2012) paragraph 3.1.8 advises that in considering planning applications local planning authorities must take into account any relevant views expressed by neighbouring occupiers and that whilst the substance of local views must be considered each case must be decided on its planning merits. With regard to public concern the Policy states that The Courts have held that ‘perceived fears’ of the public are a material planning consideration that should be taken into account. Paragraph 3.1.8 reads as follows;

*“When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the **substance of local views must be considered**, the duty is to decide each case on its planning merits. As a general principle, local opposition or support for a proposal is not, on its own, a reasonable ground for refusing or granting planning permission; objections, or support, must be based on valid planning considerations. There may be cases where the development proposed may give rise to public concern. The Courts have held that perceived fears of the public are a material planning consideration that should be taken into account in determining whether a proposed development would affect the amenity of an area and could amount to a good reason for a refusal of planning permission. It is for the local planning authority to decide whether, upon the facts of the particular case, the perceived fears are of such limited weight that*

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*a refusal of planning permission on those grounds would be unreasonable."*

*(Planning Policy Wales, Edition 5, November 2012, paragraph 3.1.8, Page 30)*

In view of the above it is clear that the views of neighbouring and third parties are relevant in the decision making process. This application has brought with it a significant amount of objection centring on the relationship of the proposed Civic Amenity and Recycling Centre with the adjacent property Brooklands Nursing Home.

Whilst the principle of choosing to site the Civic Amenity and Recycling Centre adjacent to a nursing home is not, of itself alone, a material planning consideration the consideration of its appropriateness in terms of location, impact upon the amenity of neighbouring occupiers by reason of noise, odour, dust and traffic, as well as the impact of the proposal upon the wellbeing of the residents of Brooklands Nursing Home are all material considerations to be taken into account with the assessment to be made primarily on the basis of Policy 30 of the Local Development Plan.

An extensive level of consultation has been undertaken both prior to and following submission of the application and there is clear public opposition to the scheme presented. In general the letters received raise concerns regarding the principle of constructing the site adjacent to a Nursing Home and the potential for noise, traffic, attraction of vermin and the potential for distress to the residents of Brooklands Nursing Home.

The applicants have submitted a noise assessment for the proposed site to consider the noise impacts associated with the installation and operation of plant and equipment on site, as well as the noise impact associated with increased traffic on the A478. The assessment explains that in the case of waste management sites noise issues may arise due to general traffic noise, waste collection, vehicle manoeuvring and the deposition of waste. In addition glass/bottle banks raise matters of noise where bottles are smashed in the base of the containers.

The Authority has consulted with the Environmental Health Section of Pembrokeshire County Council with the advice being that there is a potential for activities on site to impact on residential amenity, however they feel that suitable conditions could be imposed to mitigate the impacts to a satisfactory level.

The consultation response advises that potential impacts may include noise from comings and goings of users and delivery and collection vehicles, noise from site activities, noise from site plant and equipment including skip compaction, lighting associated with the site as well as odour and dust.

Noise assessments of plant noise impacts have been submitted to support the application and in particular taking into consideration the sensitivity of the Brooklands Nursing Home. A daytime level of 55dB is recommended by the World Health Organisation (WHO) to ensure the amenity of people in gardens

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and open areas. Using measurements taken from the Waterloo Waste Civic Amenity site carried out by Capita Symonds in 2005 noise was assessed in accordance with BS4142: 1997 using IMMI Noise Modelling Software. This allowed for more accurate consideration of distance between receptors, elevation of receptors and angle of view.

The submitted information predicts that the levels of noise generated from the development will be below the WHO target noise limit over the proposed opening hours. The predicted impacts are based on a 'worst case scenario' and assume that all plant and activities will be running simultaneously, and assumes a free-field for propagation of noise.

The data provided in the study states that at Brooklands, with all activities occurring simultaneously (i.e skip compactor, filling of bottle banks, loading of skips) operational noise impacts are predicted to be approximately 5.0 dB below background noise level without acoustic screens in place. With acoustic screens in place noise levels are predicted to be approximately 8dB below background at the most exposed façade and advises that complaints are unlikely. At Bethesda the worst case noise levels are predicted to be approximately 4 dB below background noise levels without acoustic screens in place and approximately 7 dB below background noise levels with acoustic screens in place.

Notwithstanding this the assessment also advises; *"at times impact noise from the glass/bottle banks may be audible at Brooklands Nursing Home and Bethesda"* It suggests, however, that localised screening to be provided at the glass/bottle bank will reduce noise impacts to below the background noise level at both locations as well as reduce noise impacts from individual noise events and complaints would be unlikely.

The Environmental Health Section note that the mitigation measures include screening comprising a 2.4m high noise screen around the glass collection skips to reduce noise from the glass/bottle banks. Consideration has also been given to use of site plant, such as the telescopic handler, and vehicles would be fitted with 'smart reverse alarms'. The delivery and removal of skips will only take place during site operating hours and the moving of the skips will be closely supervised to ensure they are moved gently into position and avoid unnecessary banging. Further measure such as managing staff behaviour and actions on site will be implemented to reduce site noise and staff are to be instructed not to shout on site and to switch off all plant when not in use. In this respect no objection is raised by Environmental Health subject to operating hours being confined to public hours of 8am to 5pm during 1 April to 30 September and 8am to 4pm during 1 October to 31 March. Operating hours suggested are 6.30am to 7.30pm. In relation to noise control a condition is requested in order to provide a scheme of noise control to be agreed in writing for mitigating noise from site activities.

In regard to operational traffic noise the assessment submitted concludes that there would be a net increase on 0.1dB level due to the additional traffic and this will not result in an adverse noise impact.

Construction noise levels have been predicted due to the absence of a detailed programme and inventory of construction plant. The information provided indicates there is a potential for significant construction noise impact where work takes place in close proximity to receptor locations. Baseline noise measurements indicate that noise levels are generally between 47 dB and 55dB during typical construction hours of 8am to 6pm although according to the information construction noise impacts would likely be above 60 dB and referred to as significant although advises that construction noise limits would need to be agreed with the Pembrokeshire County Council Pollution Control officer once a construction programme has been finalised. To minimise such noise the assessment advises that Best Practice Measures could be adopted.

In relation to odour the submitted Air Quality Assessment advises that the Civic Amenity and Recycling Centre has the potential to cause air quality impacts during the construction and operational phases. Potential construction phase air quality impacts were identified from fugitive emissions as a result of earthworks, construction and track out activities. These were predicted to be negligible at all sensitive locations subject to the implementation of good practice dust control measures.

The Assessment advises that potential impacts during the operational phases may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. Predicted emissions were negligible at all sensitive receptor locations. Furthermore the operation itself may result in fugitive dust and odour emissions although the assessment concluded that this would be negligible at all sensitive receptor locations.

The Environmental Health Section of Pembrokeshire County Council raise no objection to the methods employed and recommends a condition be attached providing a scheme of odour control as well as a dust control scheme be submitted and agreed. It is also noted in the assessment that a number of management procedures have been proposed to minimise any adverse effect of site odours including:

- Putrescible (non-recyclable) waste would be stored in sealed containers and under cover where possible;
- Remove green waste storage containers on a regular basis to avoid significant degradation of material on site. This would be undertaken even if the container is only partially full
- Ensure paints and motor oils are stored in sealed containers as far as practicable;
- Remove compactor container seals effectively to avoid odour emission;
- A deodoriser would be available for application on odorous waste;
- Any particularly odorous waste would be removed from the site within 6 hours unless agreed otherwise with the Regulator;
- Cover and loads entering and leaving the site;
- Maintain a high standard of housekeeping and do not allow degradable materials to accumulate on-site;

- Do not store materials outside of designated containers/areas; and,
- Provide suitable staff training on odour management techniques and implications of not controlling emissions

Having regard to the submitted report and consultation response from Environmental Health the data provided suggests that conditions could be attached to control the noise and any odour emanating from the site.

In considering 'Amenity' it is important to consider not only the potential for noise, traffic and odour disturbance but to consider the appropriateness of the development in the location and its scale in the surroundings. Policy 30 advises that development will not be permitted where it has an unacceptable impact on amenity, particularly where, a) the development is for a use inappropriate for where people live or visit, the development is of a scale incompatible with its surroundings, c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or d) the development is visually intrusive.

It is noted through the correspondence received that Brooklands Nursing Home provides specialist care for people with Alzheimer's and Dementia. The application site adjoins the boundary of the nursing home to the west. With a group of approximately 40 residents, staff and visitors to the site there will be distinct awareness of the Civic Amenity and Recycling site in close proximity as well as the activities taking place on site including the additional traffic to the site, the sorting of waste and recycling materials. The Authority has been advised that the most recent extension to Brooklands along its west elevation houses a specialist 5 bedded unit providing long term care for male clients with complex needs and is sited approximately 4m from the boundary of the application site.

A series of letters have been provided from professionals including consultant psychiatrists. These letters all raise similar concerns regarding the proposals and particularly the potential disruption, noise and levels of activity from the proposed development and the residents wellbeing. Dr Rowan Wilson, a Consultant Psychiatrist advises *"In my clinical view, the disruption, noise and increased level of activity that are likely to be associated with a recycling facility adjacent to Brooklands will have an extremely detrimental effect on the health of the patients who live there. They have conditions that benefit from a low-stimulus environment and noise/disruption/increased activity could lead to: i) A reaction in the form of increased distress; (ii) The emergence of challenging behaviour; and (iii) A possible accelerated decline in their condition"*. A letter from Dr K. O'Doherty advises; *"The home in question provides quality care and supervision of patients in peaceful and relaxing surroundings. Tranquillity and regularity of daily life being integral to the wellbeing of patients being cared for in this home"*. A letter from Tom Alexander, a Dementia Co-ordinator for Pembrokeshire advises that dementia often worsens sensory stimulation and foresees that extra noise could over stimulate, disorientate and cause distress for those with dementia at Brooklands and whilst in planning the noise impact has been made minimal this extra low-level noise could cause distress for those with dementia.

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Whilst it can be accepted through the assessments provided that there is no objection raised by Environmental Health on noise or odour matters Policy 30 and more specifically criterion a) requires that the development is for a use that is appropriate for where people live and visit. In view of the relationship between Brooklands Nursing Home, and the close proximity of the access to the proposed Civic Amenity and Recycling Centre it can be concluded that the development proposed - an industrial type of development - is not appropriate for where people live and visit. Notwithstanding the provision of conditions to require noise and odour surveys the assessments determine that there remains potential for noise from the site. This potential for noise along with the likely additional vehicular movements to and from the site suggests that the siting of the site to provide public access for waste recycling in close proximity to Brooklands Nursing Home results in an inappropriate relationship between the two uses.

In relation to criterion b) of Policy 30 it can be determined that the Civic Amenity and Recycling Centre is of a scale that is not compatible with its surroundings. The surrounding site is characterised by a rural setting and complemented with properties of a residential form and scale. It cannot be held that the development would fit in with this context of existing built development.

With regard to criterion c) which refers to an increase in traffic, noise, odour or light which would have a significant adverse impact, the assessments conclude that whilst the development is unlikely to cause adverse harm and could be monitored through conditions there remains the potential for activities on site to impact on residential amenity as advised by Environmental Health. The location of the access to serve the site is of particular concern and whilst the traffic movements to and from the site may not result in an adverse impact upon highway safety there will remain potential for vehicles, once entering through the access to create intermittent noise through accelerating and stopping. Additionally the acoustic screening to the glass/bottle banks may reduce noise to the surrounding areas but there would remain potential for noise from this along with potential for general day to day noise from the environment created.

The final criterion to Policy 30, criterion d) refers to development which is visually intrusive not being acceptable. An assessment of the visual impact of the scheme has been made in earlier paragraphs concluding that there would be a harmful impact upon surrounding visual amenity

To summarise,

- it is accepted that measures could be introduced to provide mitigation of noise and odour in line with the recommendations of the Environmental Health Section of Pembrokeshire County Council. For example the proposed measures including the planting of bunds and provision of acoustic screens will help displace any noise and odour.

- there remains uncertainty that there would be no adverse noise or impact upon the residents of Brooklands Nursing Home including a number of vulnerable residents with challenging conditions and behaviour.
- the development will result in additional vehicular movements to and from the site and there will likely be additional noise and disturbance created as a result of this movement.
- Furthermore the nature of activity and the potential for noise disturbance gives rise to concerns that there will be an impact upon neighbouring amenity and particularly the residents of Brooklands Nursing Home.

For these reasons it is concluded that the development is for a use which would be inappropriate for a location near to where people live or visit particularly due to the close nature relationship between the application site and Brooklands Nursing Home. Furthermore the development will be of a scale incompatible with its surroundings which are typically a rural context with residential pockets of development. As such the scheme will impact unacceptably upon general amenity in the area and the scheme fails to comply with the aims of Policy 30 of the Local Development Plan.

#### **Access, Highway Safety and Parking**

It is accepted in the draft TAN 21 – Waste that waste management facilities have the potential to generate a large increase in vehicular movements within the locality. Vehicular movements, transport and access are material planning considerations. Policy 53 – Impacts of Traffic of the Local Development Plan is of particular relevance in that development will be permitted only where there will be no unacceptable impact of traffic on congested areas or at times of peak traffic flows, where traffic is likely to be generated at inappropriate times particularly at night in residential areas, where there is an unacceptable impact on road safety or where significant environmental damage would be caused and cannot be mitigated. This policy follows the aims of Technical Advice Note 18 – Transport.

It is clear from the proposal that access to the site is proposed from an existing made up access off the A478. It would appear that the access was constructed to the design standards of the road constructed although its intended use never implemented. The applicant's have submitted a Transport Statement to accompany the scheme, the purpose of which being to provide an assessment of the potential transportation impacts of the development and identify mitigation requirements where necessary.

Looking at the Traffic Statement it can be noted that various studies have been undertaken to support the scheme and this included an analysis of traffic flows and impacts in relation to the proposed development. An automatic traffic count (ATC) was conducted adjoining the site between Saturday 26<sup>th</sup> May and Friday 1<sup>st</sup> June 2012. The results of the survey commissioned showed that on a weekday morning in a peak hour (8:15 to 9:15) there were 707 vehicular movements, on an evening peak hour (16:30 to 17:30) there

were 806 vehicular movements and a peak hour on the weekend (11:00 to 12:00) there were 963 vehicular movements. The annual average of weekday traffic (between 06:00 and 24:00 Monday to Friday) was 9669. Results showed there was an average speed of 46 mph along the highway adjacent to the application site.

A study of accident data was also undertaken with analysis provided for a 5 year period prior to 29<sup>th</sup> February 2012. This identified that there were no accidents directly outside the site although a description of three accidents along the road provided with no specific trends of unusual data found.

A Traffic Impact Assessment has been provided and this sets out the vehicle trip rate and traffic generation methodology that has been used in order to forecast the volume of traffic that could be generated by the proposed Civic Amenity and Recycling facility. Taking into account the figures provided by the ATC the study sets out firstly an estimation of background traffic volumes along the A478 carriageway in 2012 without the development and 2018 without the development. The study then advises that figures provided by Pembrokeshire County Council forecast that the proposal is likely to generate 340 vehicle movements (one-way) on a typical weekday and 348 vehicle movements (one-way) on a typical weekend day.

With regard to the proposed development and taking a future year of 2018 there are estimated to be 38 more trips as a result of the development taking place than the existing 707 movements from the ATC, 46 more evening peak hour movements than 806 and 98 more weekend peak hour movements than the 96. As a result of the figures the study estimates that traffic generation would increase by 4.9% (morning peak hour), 5.3% (evening peak hour) and 9.5% (weekend peak hour). The predicted increase in average weekday and daily traffic flows on the A478 carriageway in 2018 with the development in place has been estimated to amount to 6.6% and 6.5%.

The Authority has consulted with the Highway Authority of Pembrokeshire County Council with no objection raised on highway safety or transportation matters. The response received considers access, trip generation and the layout and parking of the site.

In respect of access the Highway Authority advise that forward and exit visibility from the existing access is satisfactory and apart from localised amendments to the junction bell mouth to allow some widening it appears that no amendments are required to the existing junction layout to ensure it will operate safely. An area of concern raised through public consultation is the existence of 2 junctions in close proximity (Brooklands and Application Site) and the potential for conflict between the 2 particularly the queuing of vehicles along the turning bay. The Highway Authority note the potential for conflict of movement between the two accesses although when considering the relatively low level of traffic generation from both sites advise that the likely number of conflicts would be limited and the inter-visibility between the 2 junctions is adequate.

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Trip generation has been considered with comment that the Transport Statement has estimated a potential gross week day trip generation to the development of 340 1 way trips and 680 2 way. The Highway Authority notes that the suggested level of traffic can be accommodated within the highway network and on checking the methodology state that this would appear a reasonable conclusion. They also note that the assessment has not factored in link or diverted trips which is likely to reduce the estimated growth predicted and states that that conclusions are considered to be robust.

With regard to the layout and parking provided by the site the Highway Authority notes that the internal route is laid out as a one way system with set down areas for site users. The separation of customer and operational areas removes conflict and staff parking provided within the site appears adequate.

Based on the evidence provided in the Transport Statement and the response from the Highway Authority it can be reasoned that the scheme will not impact to any adverse degree upon the existing highway network and suitable access and parking is proposed to serve the use. As such the scheme complies with criteria listed within Policy 53 of the Local Development Plan. Notwithstanding the acceptability of the scheme on highway safety aspects and for the reasons set out above this would not override the harmful impact of the additional vehicular movements upon both visual and public amenity in the locality.

### **Nature and Archaeological Conservation**

Policy 8 criterion (d) of the LDP identifies that the priority is given to the protection and where possible enhancement of the historic environment. This policy is in line with guidance contained within Planning Policy Wales (5<sup>th</sup> Edition, November 2012) particularly Chapter 6 – Conserving the Historic Environment and the advice contained in Welsh Office Circular 60/96 – Planning and the Historic Environment: Archaeology.

In view of the above framework the applicant has undertaken an archaeological appraisal which has been undertaken to assess the archaeological potential of the application site. The scope of the appraisal was agreed with Dyfed Archaeological Trust to include a site visit, consultation of the historic environment record, historic maps and on-line databases to establish the presence or absence of any designated sites.

The search has revealed that there is a background of archaeological activity for several periods in the area. There is a Scheduled Ancient Monument (SAM) within 1km of the site, a standing stone, which indicates the importance of the area in prehistoric times. Other indications include medieval ridge and furrow as well as post-medieval farms and evidence of post-medieval industrial activity in the form of limekilns and coal pits. Notwithstanding this there is no evidence of such activity on the site itself and the conclusions identify that there is no evidence to suggest that the proposals would have any significant effect on any heritage assets.

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Dyfed Archaeological Trust has raised no objection to the scheme indicating that the proposal will not impact on a known archaeological resource. As such no further action or conditions would be required to protect the historic environment.

### **Land Drainage and Flood Risk**

The potential effects on water resources are a material planning consideration and there should be no possibility of run-off, spillage or leachate pollution of surface or groundwaters. Furthermore waste management facilities proposed in areas without existing flood defence infrastructure that are regularly or potentially subject to flooding are unlikely to be acceptable.

Policies 29, 32 and 34 of the Local Development Plan are therefore of relevance in considering water management and flooding.

The Authority has consulted with Natural Resources Wales and advice received notes that the application site lies within zone A as referred to by the development advice map (dam) referred to under Technical Advice Note 15 – Development and Flood Risk (July 2004). The Flood Map information, which is updated on a quarterly basis, confirms the site falls outside the extreme flood outline. Subject to a condition requiring the submission and agreement of a scheme to dispose of surface water there is no objection to the scheme submitted.

### **Biodiversity**

Policy 8 criteria (g) and Policy 11 of the LDP refer to the protection of biodiversity and identifying that development that would disturb or otherwise harm protected species or their habitats will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures.

The scheme was supported with an Extended Phase 1 survey carried out on the land in May 2012. The site was surveyed for protected species and habitats and established there were limited opportunities for reptiles, evidence of badgers was recorded but no setts are present on site, there would be limited impacts on birds and bats. The trees on site are unaffected by the development and with careful timing nesting birds would not be disturbed. Two buildings are present on site but neither offer any roosting opportunities, several trees were identified that may be used by roosting bats but these are also unaffected by the proposed works. The area of marshy grassland was identified as a habitat of ecological value, this is to be lost as a result of the proposals however is to be recreated and enhanced within the footprint of the site.

Overall the proposed development is not expected to result in any significant adverse effects to protected species or habitats. The report makes recommendations including the addition of bat and bird boxes and it is encouraged that these are followed.

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Due to the proximity of the Beech Cottage, a SSSI component of Pembrokeshire Bat Sites and Bosherton lakes SAC a HRA screening assessment was undertaken. The screening comprehensively assessed the potential impact of the proposed development and concluded that there would be no significant effects on the conservation objectives of features of the SAC as a result of the development.

As long as the works are undertaken as per the drawings submitted and as per the recommendations made in section 4.9 (pages 32-33) of the 'New Hedges Civic Amenity and Recycling Centre – Environmental Report, Hyder Consulting, 22<sup>nd</sup> February 2013' then there is a low likelihood of any adverse impacts on ecological features.

The Authority consulted with CCW (prior to the transfer of their functions to Natural Resources Wales on 1<sup>st</sup> April 2013) on receipt of the application. The response received advised of no objection to the scheme submitted. As such it can be concluded that the scheme would have no adverse impact upon protected species.

### **Land Stability**

The site constraints identify the site as being partly within a coal mining area, identified by the Coal Authority, as containing potential hazards arising from coal mining. As such and in accordance with the Authority's SPG – Land Instability – former coal workings required the submission of a Coal Mining Risk Assessment Report to be submitted and set out the position in relation to former mining activities and assess the risks from coal mining activities on the proposed development. The Draft TAN 21 states at paragraph 5.1 "Waste management and disposal sites should not be located where they could be affected by land instability".

The submitted report includes up-to-date coal mining information and correctly identifies that the application site is located in an area where unrecorded underground coal mining activity may have taken place at shallow depth. The assessment recommends that intrusive site investigation works be undertaken to confirm coal mining conditions and to enable the design of any necessary mitigation measures prior to commencement of the development.

Through consultation the Coal Authority concurs with the findings of the report and offers no objection subject to a condition requiring intrusive investigation works as recommended in section 6 of the Coal Mining Risk Assessment be undertaken prior to the commencement of development. Subject to the imposition of a condition there is considered to be no objection on land stability matters.

### **Other Material Considerations**

The applicants suggest that an important material consideration is the economic considerations associated with the securing of grant funding to enable this development to take place. They state that the availability of financial support through the European Convergence Programme is key to this development proceeding and is the catalyst to enable the delivery of the scheme with the benefits to serve South East Pembrokeshire. They explain that failure to proceed with the development within the timescales set by the availability of grant support will threaten the provision of an identified need for a waste management facility and the failure to deliver an important element of the LDP. Whilst it is noted that the scheme is reliant on funding this in itself is not considered sufficient to outweigh the harm identified both in relation to the principle of the development when judged against the policy framework and upon the special qualities of the National Park. A site is not specifically allocated for such a use within the LDP and as such it cannot be judged to be an important element of the LDP.

In view of the cross boundary nature of the proposal and its siting within the county of Pembrokeshire it is also relevant to consider policy outside the National Park area. It is relevant to note the recent Adoption of the Pembrokeshire County Council Local Development Plan on 28<sup>th</sup> February 2013. In examining the final report the inspector on 5<sup>th</sup> February 2013 referred to the Council identifying a requirement for a new civic amenity site in south-east of the county due to the constrained size of the existing facility at the Salterns, Tenby. It had been noted that a site at Kingsmoor Common near Kilgetty had been identified in the Deposit Plan although deleted due to common land and access constraints. Reference was made to the identification of a site within the National Park although there was insufficient certainty that the site is deliverable. The inspector agreed that due to the uncertainty over the site the monitoring framework should include an indicator to measure progress towards finding the new site and that if found within the Plan area that a proposal would be judged against the Council's LDP policy.

Paragraph 6.162 of the Adopted Pembrokeshire County Council Local Development Plan states;

*"The Civic Amenity site at the Salterns, Tenby, is constrained by size. It serves communities within and outside the Pembrokeshire Coast National Park. A new site to serve South East Pembrokeshire is required and this could be located either within or outside the National Park. The Council has identified a potential site for the new facility within the National Park and intends to submit a planning application to the National Park Authority in the near future. If the application is unsuccessful, the search for a site will continue. If such a site is found in the Council's planning area, any related planning application would be considered through policy GN.41 (waste minimisation, re-use, recovery, composting and treatment), any other relevant LDP policies and national and regional guidance."*

There is no guidance or steer given in the Policy or the inspector's report to suggest that the site subject of this application is the only site that could provide the required need for a Civic Amenity Site in the area. Furthermore

there is no guidance as to why such a development should take place within a National Park, which by reference to the South West Wales Regional Waste Plan 1<sup>st</sup> Review (August 2008), is identified as an exclusion area in the Areas of Search for facilities serving more than one local authority area and being a major development should only be allowed in exceptional circumstances

As such there are no other material considerations that would override the principal objection to this development in the countryside and the harm identified above.

### **Conclusion**

It has been demonstrated from the information provided as part of the application that the existing Civic Amenity Site at The Salterns is not providing the same rate of recycling found elsewhere in the County at Hermon, Manorowen, Pembroke Dock, St David's and Winsel. As such its redevelopment or relocation has been identified as a priority to increase waste recycling in South East Pembrokeshire. It is also noted in the Pembrokeshire Coast National Park Local Development Plan that regard has been given in the supplementary text to Policy 27 – Local Waste Management Facilities for the provision of a 'relocated enlarged facility' within the National Park provided that Policy 15 is met and on the understanding that the facilities would 'predominantly serve the National Park area'. It would appear that the Authority accepted that there could be no new facilities in the National Park in line with the Regional Waste Plan although an exception could be made due to the existence of the site at the Salterns, Tenby.

Following a detailed consideration of the merits of the application it can be concluded that whilst there is a need for a new or enhanced Civic Amenity Site to serve South East Pembrokeshire the application site put forward for determination is not considered to be appropriate. The proposed development of the site is considered to represent an inappropriate and harmful urban form of development on land within the open countryside and along a key tourist route into the National Park. As such the proposed development will by its very form, character and scale erode the special character and qualities of the National Park and will not be compatible with the strategic aims of the National Park Authority and Policy 1 of conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of those qualities. Further to this concern there is a lack of information to conclusively demonstrate that the proposed site for a Civic Amenity & Recycling Centre will serve predominantly the National Park Area in line with the aims of paragraph 4.120 of the Local Development Plan given the absence of Narberth from the catchment area of the proposal.

In addition to the principle identified above the industrial appearance of the development and its facilities, the associated lighting columns, vehicle movements and signage will impact unacceptably upon visual amenity and the special qualities of the National Park contrary to the aims of policies 8, 9 and 15. The lighting columns will by virtue of their form and positioning result

in the introduction of new lighting into an otherwise unspoilt and unlit area of countryside contrary to the aims of policies 8, 9 and 15.

Finally, whilst measures including the planting of bunds and provision of acoustic screens have been introduced in an attempt to mitigate noise, odour and disturbance from the development, particularly in view of its relationship with the adjoining Brooklands Nursing Home, there remains concern that the very form and nature of development will introduce disturbance to the lives of the vulnerable residents at Brooklands Nursing Home contrary to the aims of policy 30. Whilst the scheme is not predicted to result in noise levels being any greater than that of the background noise of the adjoining highway and any odour could be dealt with by suitable management procedures the increased level of vehicular access and movement to and from the site, the scale of heavy vehicles entering and leaving the site, the nature and type of activity taking place on the site and the potential for sudden noise disturbance will likely impact upon the residents at Brooklands Nursing Home to an unacceptable degree.

### **Recommendation**

The application be refused for the following reasons:

### **Reasons**

1. The proposed development of the site represents an inappropriate and harmful urban form of development on land within the open countryside and along a key tourist route into the Pembrokeshire Coast National Park. As such the proposed development will by its very form, character and scale erode the special character and qualities of the National Park and will not be compatible with the strategic aims of the National Park Authority and Policy 1 of conserving or enhancing the natural beauty, wildlife and cultural heritage of the Park, and the public understanding and enjoyment of those qualities. As such the development is contrary to the strategic aims of Policy 1 (National Park Purposes and Duty) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).
2. Insufficient information has been provided to conclusively demonstrate that the proposed site for a Civic Amenity & Recycling Centre will serve predominantly the National Park Area in line with the aims of paragraph 4.120 of the Local Development Plan. As such the scheme falls to be considered against Policy 27 (Local Waste Management Facilities). The development proposed does not serve only the needs of the National Park area and is not located at an existing waste management site or B2 industrial unit. As such the development fails to meet the principal aims of Policy 27 and the specific location requirements of criterion b) of Policy 27 (Local Waste Management Facilities) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).

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3. The industrial type design and appearance of the development, the hard lines created by the form and type of facilities, the associated lighting columns, vehicle movements to and from the site and creation of signage at the entrance will impact unacceptably upon visual amenity and the special qualities of National Park by virtue of causing significant visual intrusion, being insensitively and unsympathetically sited within the landscape, introducing a use which is incompatible with its location, failing to harmonise with or enhance the landform and landscape character of the National Park and failing to incorporate important traditional features contrary to Policy 15 (Conservation of the Pembrokeshire Coast National Park) criteria a), b), c), d) and e) and Policy 30 (Amenity) criterion d) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).
  4. The proposed lighting columns will by virtue of their form and positioning result in the introduction of new lighting into an otherwise unspoilt and unlit area of countryside. The additional lighting although predominantly down lit will cause a significant adverse effect on the character and appearance of the area within the National Park and lose a sense of tranquillity. As such the development is contrary to the aims of Policy 8 (Special Qualities) criterion (a), Policy 9 (Light Pollution) criterion b), Policy 15 (Conservation of the Pembrokeshire Coast National Park) criteria a), b), c), d) and e) and Policy 30 (Amenity) criteria c) and d) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).
  5. The proposed development will result in significant vehicular movements to and from the site and the associated noise and disturbance as a result of the additional vehicular movements, the scale of heavy vehicles entering and leaving the site, the nature and type of activity taking place on the site and potential for any sudden noise disturbance will likely impact unacceptably upon the living conditions of the vulnerable residents residing in Brooklands Nursing Home adjacent to the application site. As such the proposed development for a Civic Amenity and Recycling Centre adjacent to an existing Nursing Home is considered to be a use inappropriate for where people live or visit and is of a scale incompatible with its surroundings and is therefore contrary to the aims of Policy 30 (Amenity) criteria a) and b) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).

NP 13 0 9 3

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PEMBROKESHIRE COUNTY COUNCIL  
 CYNGOR SIR PENFRO

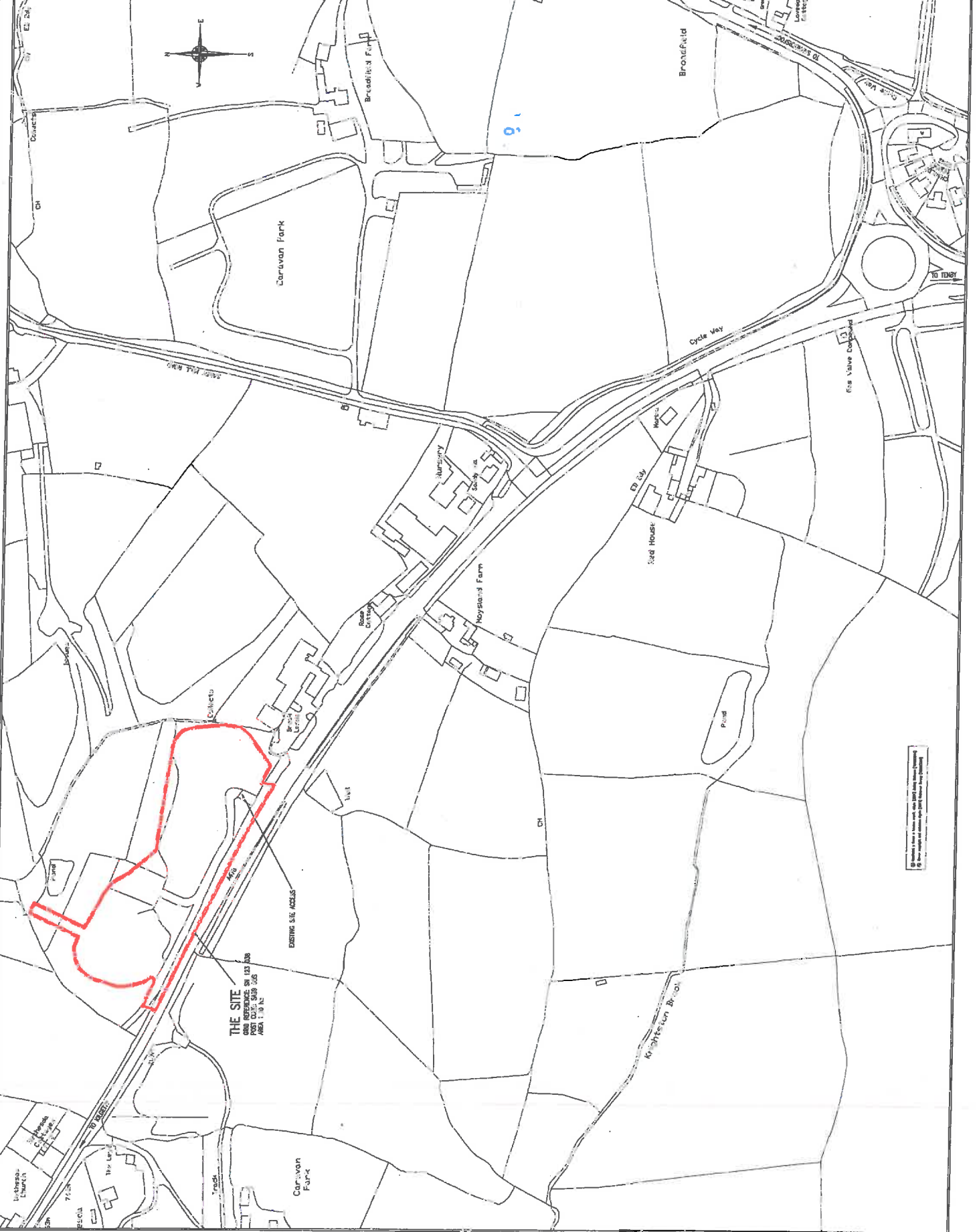
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 Haverfordwest, Pembrokeshire, SA61 1AA  
 Tel: 01323 882222 Fax: 01323 882222  
 Email: info@pembrokeshire.gov.uk  
 Website: www.pembrokeshire.gov.uk

Item 6a)

NEW HEDGES CIVIC AMENITY AND RECYCLING CENTRE

LOCATION PLAN

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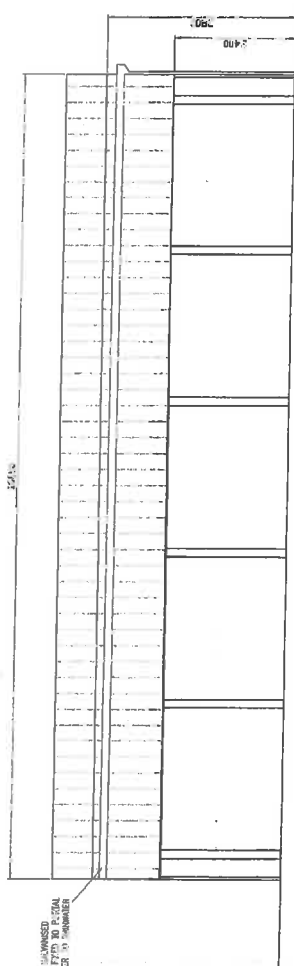
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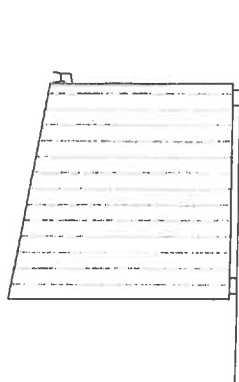




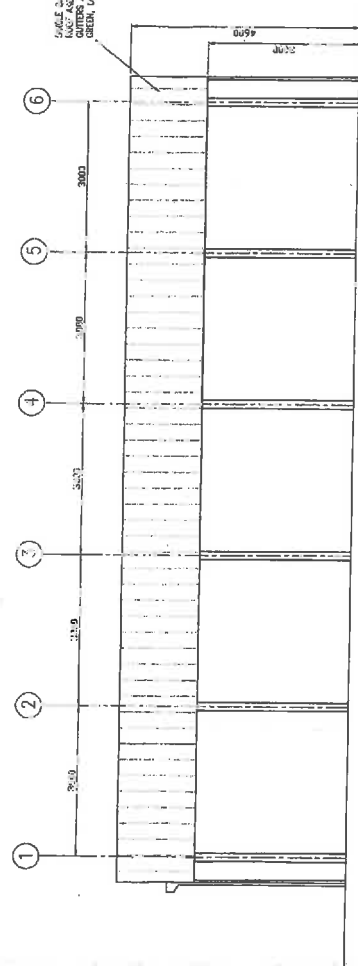




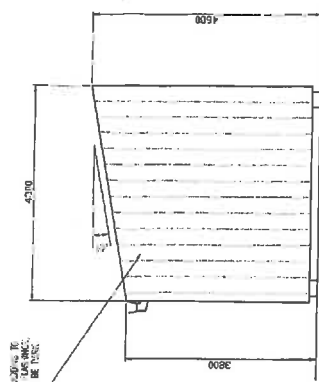
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SOUTH EAST ELEVATION

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**PEMBROKESHIRE COUNTY COUNCIL**  
**CYNGOR SIR PENFRO**

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**NEW HEDGES CIVIC AMENITY AND RECYCLING CENTRE**

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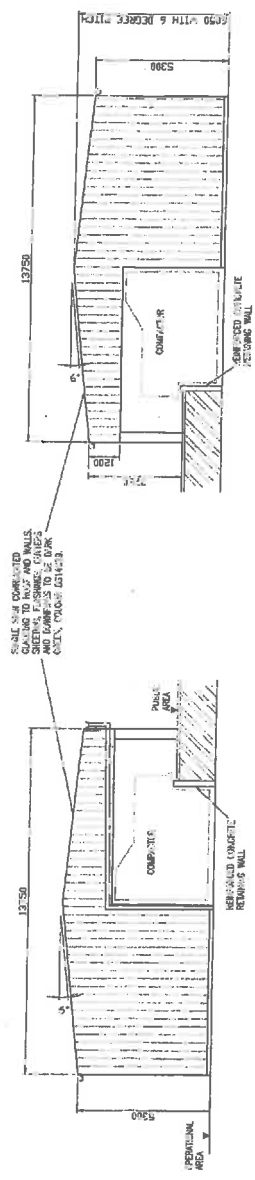
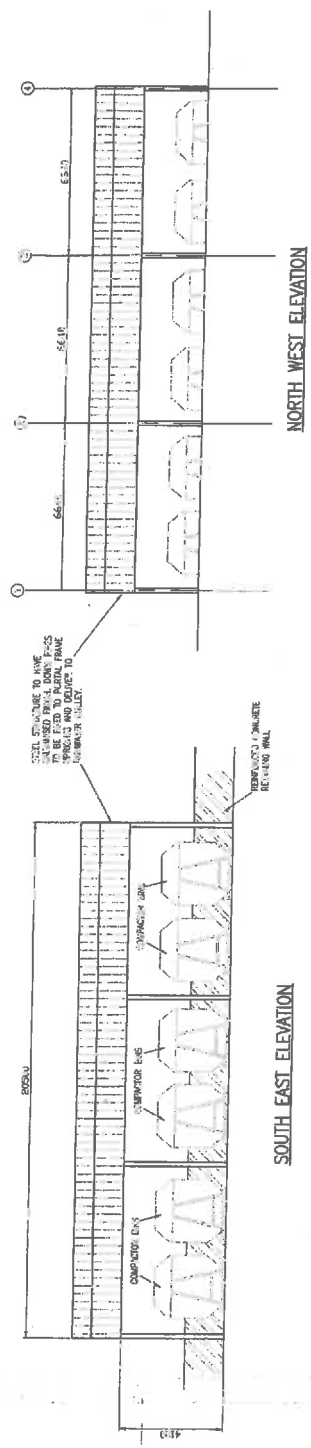
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CANOPY ELEVATIONS

PLAN

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Item 6a)



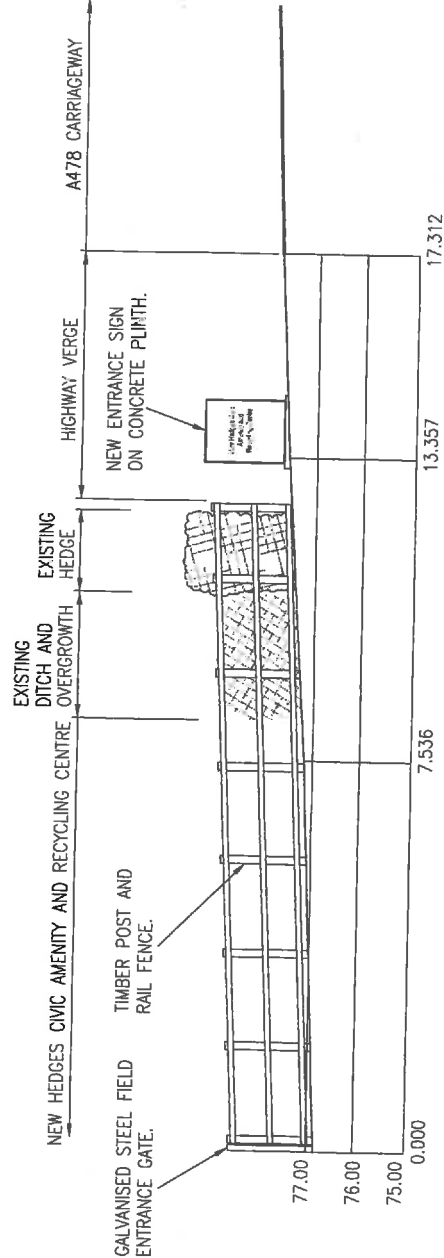
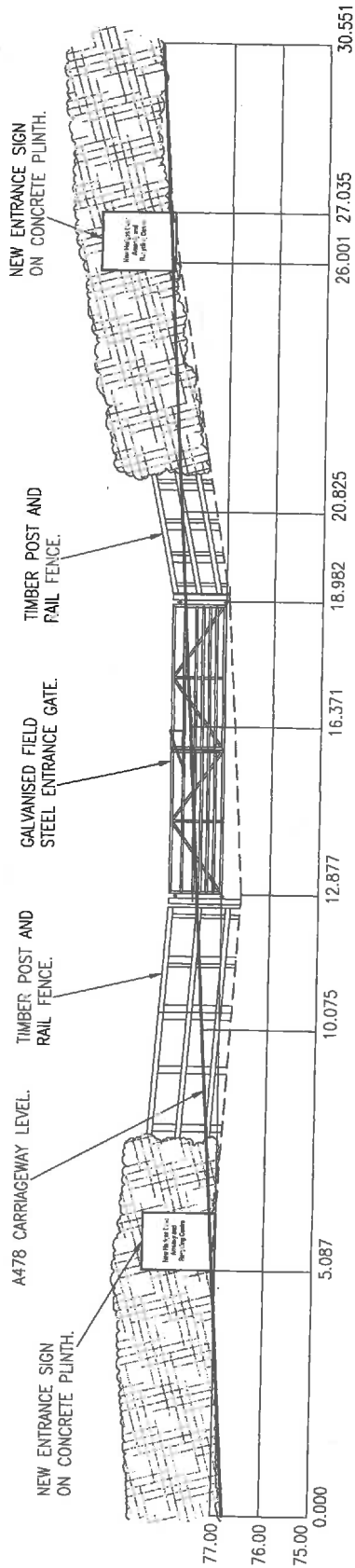
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**CYNGOR SIR PENFRO**

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**NEW HEDGES CIVIC AMENITY AND RECYCLING CENTRE**

**COMPACTOR SHED ELEVATIONS**

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**PEMBROKESHIRE COUNTY COUNCIL**  
**CYNGOR SIR PENFRO**

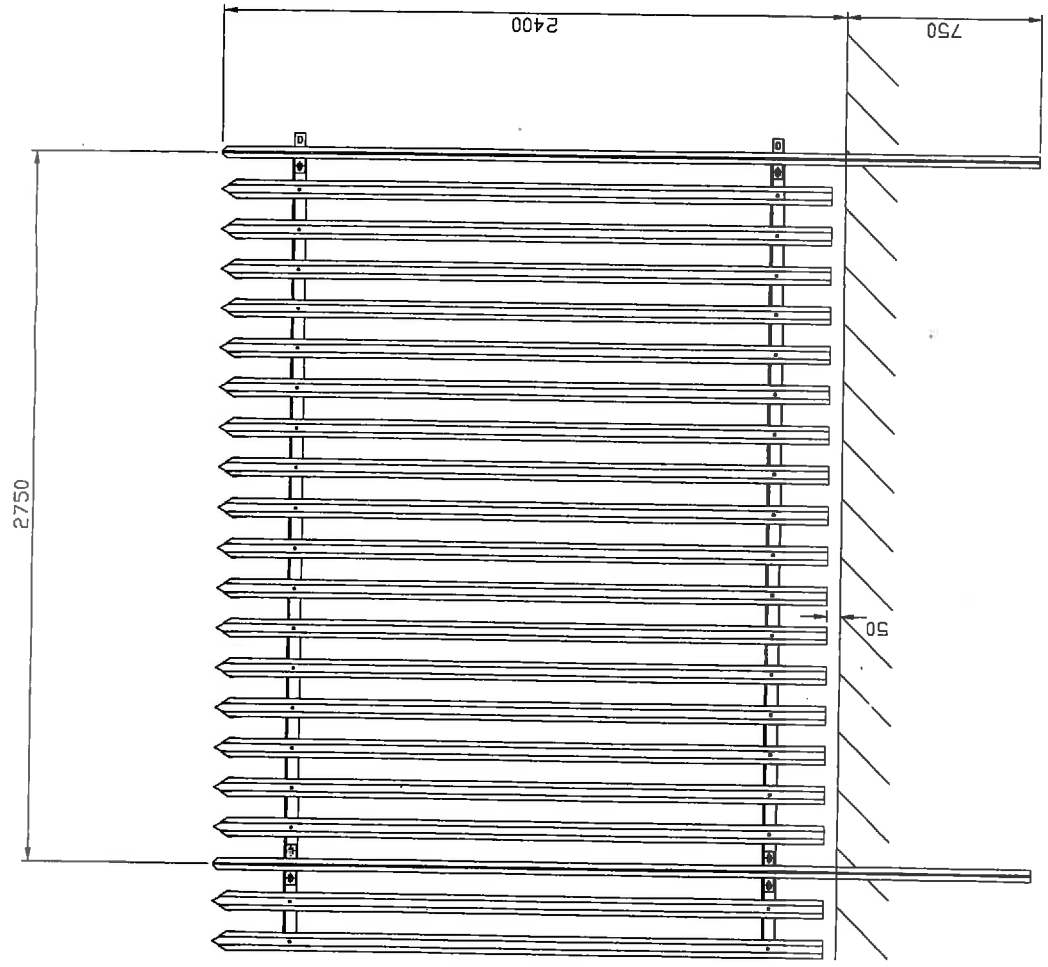
Ian R. Wesley B.Eng(Hons), C.Eng., M.I.Mech.E., M.C.I.B.S.E.  
Cyfarwyddwr Cludiant at Angloheold Director of Transportation & Environment  
Pembrokeshire County Council  
Newadd y Sir, HWLLFFORDD,  
Sir Benfro, SA61 1TP  
Ffôn: 01437 764551  
Ffacs: 01437 769451  
www.pembrokeshire.gov.uk

**ENTRANCE ELEVATION AND SECTION**

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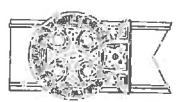
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CAD REF.	CA3502_PL025	DRAWING No.	CA3502_PL025
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**PEMBROKESHIRE  
COUNTY COUNCIL  
CYNGOR SIR  
PENFRO**

Ian R. Wesley B.Eng(Fores), C.Eng, M.I.Mech.E., M.C.I.B.S.E.  
 Cymrodwr Cludiant ar Awdurdod     Director of Transportation & Environment  
 Cyngor Sir Penfro,     Pembroke County Council,  
 Neadau y Sir, HWYFORDD,     County Hall, HAYFORDWEST,  
 Sir Bedfro, SA61 1TP     Pembrokeshire, SA61 1TP  
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DRAWING TITLE

**TYPICAL PALISADE  
FENCE PANEL**

DRAWN BY	CPJ	07/12	SCALE	AS SHOWN	A3
CHECKED	RML	07/12			

PROJECT TITLE

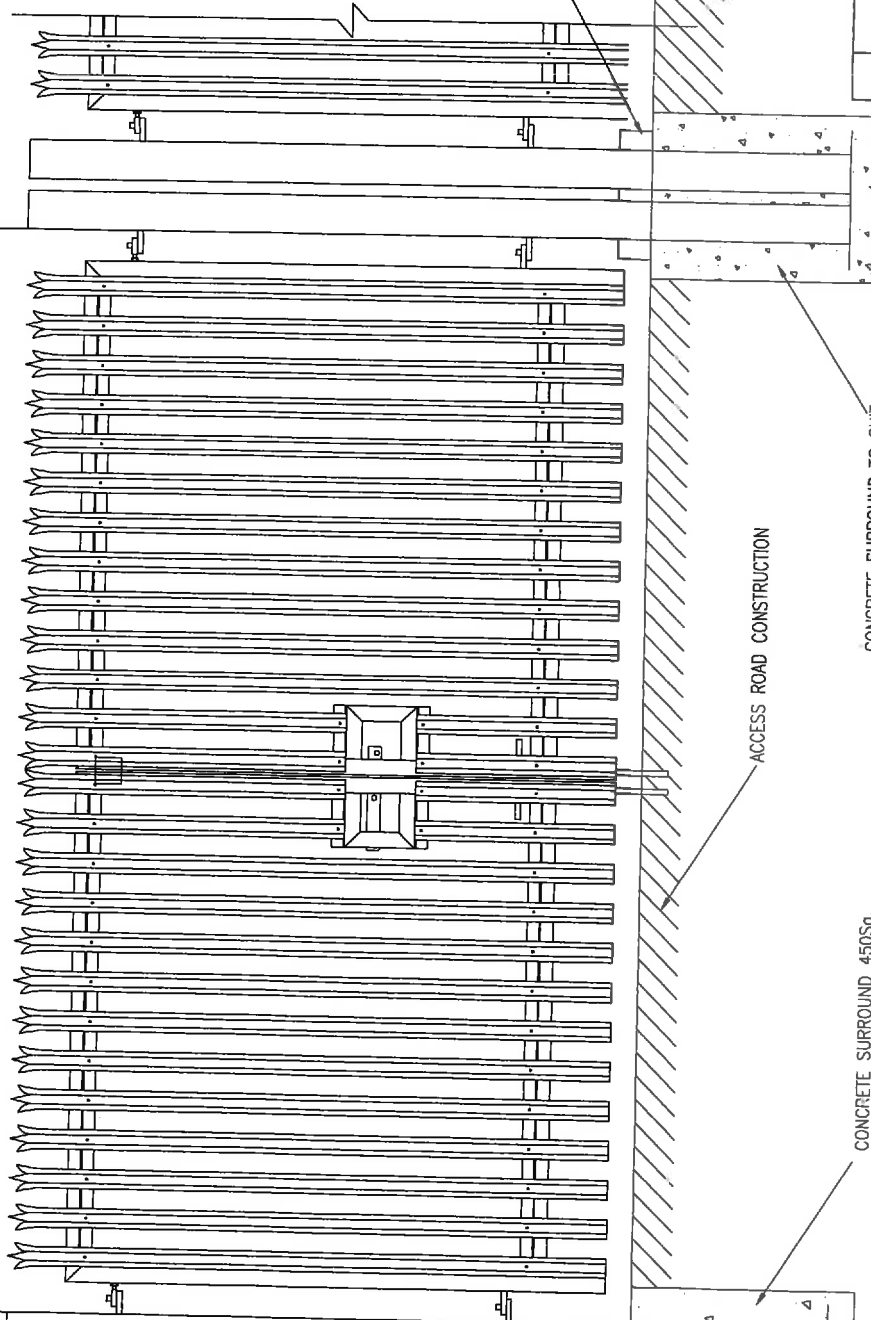
**NEW HEDGES CIVIC AMENITY  
AND RECYCLING CENTRE**

CAD REF.	CA3502_PL024	DRAWING No.	CA3502_PL024
PROJECT PHASE	PLAN	REV.	

REV.	DESCRIPTION	BY	DATE

4190

ENTRANCE GATE



EXIT GATE AS OPPOSITE

HP 13 0 9 3

CENTRAL ISLAND.

ACCESS ROAD CONSTRUCTION

CONCRETE SURROUND TO SUIT.

CONCRETE SURROUND 450sq.

Item 6a)



**PEMBROKESHIRE  
COUNTY COUNCIL  
CYNGOR SIR  
PENFRO**

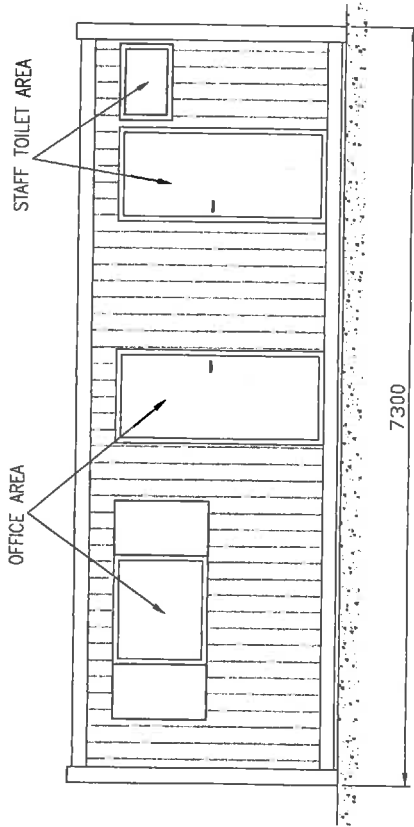
Ian R. Wesley B.Eng.(Hons), C.Eng., M.I.Mech.E., M.C.I.B.S.E.  
Cyfarwyddwr Cludiant a'r Amgylchedd Director of Transportation & Environment  
Cyngor Sir Penfro, Pembroke County Council,  
Newydd y Sir, Hwlfordd, County Hall, HILFORDWEST,  
Sir Penfro, SA61 1TP, Pembrokeshire, SA61 1TP  
Ffôn: 01437 764551 Tel: 01437 764551  
Ffacs: 01437 769451 Fax: 01437 769451  
www.pembrokeshire.gov.uk

**DRAWING TITLE**  
**PALISADE  
DOUBLE SWING GATE**

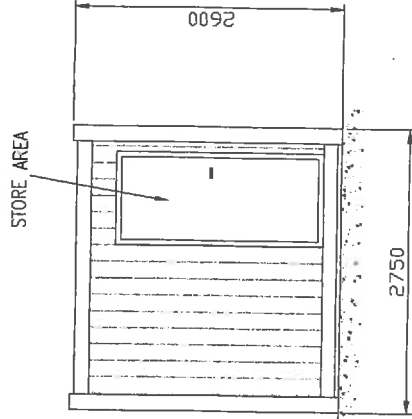
<b>DRAWN BY</b>	CPJ	<b>07/12</b>	<b>SCALE</b>	AS SHOWN @ A3
<b>CHECKED</b>	RMH	<b>07/12</b>		

<b>PROJECT TITLE</b>	NEW HEDGES CIVIC AMENITY AND RECYCLING CENTRE			
<b>CAD REF.</b>	CA3502_PL023	<b>DRAWING No.</b>	CA3502_PL023	
<b>PROJECT PHASE</b>	PLAN	<b>REV.</b>		

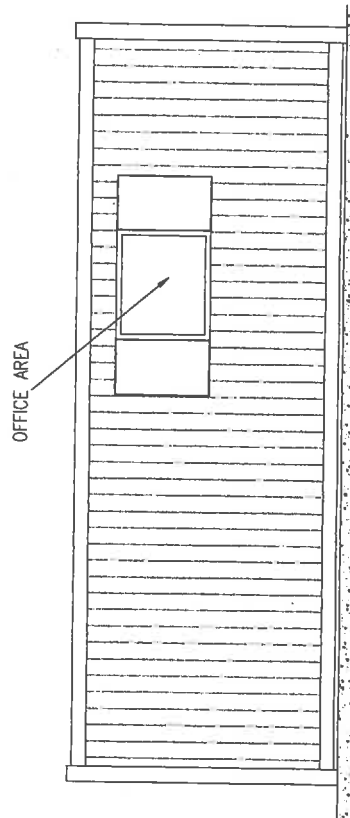
REV.	DESCRIPTION	BY	DATE



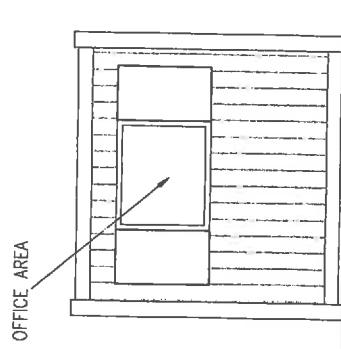
**SOUTH ELEVATION**  
SCALE 1:50



**EAST ELEVATION**  
SCALE 1:50



**NORTH ELEVATION**  
SCALE 1:50



**WEST ELEVATION**  
SCALE 1:50

NP 13 0 93

25 FEB 2003



**PEMBROKESHIRE  
COUNTY COUNCIL  
CYNGOR SIR  
PENFRO**

Ian R. Wasley B.Eng (Hons), C.Eng., M.I.Mech.E., M.C.I.B.S.E.  
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Cyngor Sir Penfro, Pembroke County Council  
Neuadd y Sir, BYLLEFORDD, County Hall, BAYVERDORWEST,  
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DRAWING TITLE

SITE OFFICE

DRAWN BY	CPJ	07/12	SCALE	AS SHOWN @ A3
CHECKED	RML	07/12		

PROJECT TITLE

NEW HEDGES CIVIC AMENITY  
AND RECYCLING CENTRE

CAD REF. CA3502\_PL022 DRAWING No. CA3502\_PL022

PROJECT PHASE PLAN

REV.	DESCRIPTION	BY	DATE

**Hyder Consulting (UK) Limited**

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Jane Gibson, BA (Hons) MRTPI  
Director of Park Direction and Planning  
National Park Offices  
Llanion House  
Pembroke Dock  
Pembrokeshire  
SA72 6DY

18 June 2013

Dear Mrs Gibson

**Development Management Committee Meeting 19<sup>th</sup> June 2013: Application Ref: NP/13/0093 - Construction of Civic amenity and Recycling Centre, incorporating an internal access road, site access improvements, erection of a compactor shed, canopy shed and welfare office, provision of containers, skips and igloos, staff and visitor parking, weighbridge area and quarantine area, lighting and site signage, fencing and landscaping works on land adjoining Brooklands, Saundersfoot, Pembrokeshire.**

Further to the letter of your Chief Executive dated 17<sup>th</sup> June 2013 addressed to the County Council's Director of Transportation, Housing and Environment, in which you inform that you are unable to accept the request for the planning application to be deferred, I have been instructed, as agent for the Council to confirm that we wish to formally withdraw the planning application, as currently submitted.

This position follows the advice provided to the Council that it could, if so wished, withdraw the planning application in order to address the reasons for refusal in a future submission.

In the circumstances therefore, this is considered to be a necessary course of action to enable the Council to consider its position more fully, in order to determine an appropriate response in the light of the planning officer's recommendation and the reasons for refusal.

I should be grateful if you could formally confirm the Authority's acceptance of this request and that as a consequence, the planning application should not be considered for determination at tomorrow's Development Management Committee Meeting.



INVESTOR IN PEOPLE



I should also be grateful if you could advise your colleagues that the request, previously made by ourselves to speak at tomorrow's Meeting is also hereby withdrawn.

Should you require any further information in relation to this request, please contact me.

Yours sincerely

A handwritten signature in black ink that reads "David Jones". The signature is written in a cursive style with a large initial 'D'.

**David Jones**  
**Principal Planning Consultant**