

## Emma Evans

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**From:** Darren Brown [REDACTED]  
**Sent:** 12 December 2024 09:03  
**To:** LDP - For Enquiries  
**Subject:** LDP2 Representations on behalf of Mr & Mrs Beynon - Trefloyne Manor, Tenby  
**Attachments:** Trefloyne Manor Sustainability Assessment FINAL.pdf; Site Location Plan.pdf; Covering Letter.pdf; Deposit Plan 2 Comments Form.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** D Rep

EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.

Good morning

On behalf of our client Mr and Mrs Beynon, please find attached the following in respect of the above consultation:

Covering letter;  
Representation forms;  
Site location plan; and  
Trefloyne Manor Sustainability Assessment.

I trust that the attached is sufficient to register the representation as valid.

I look forward to receiving confirmation of safe receipt.

Kind regards  
Darren



*Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.*

*Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.*

*Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.*

***Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024.** Dychwelwch ffurflenni at: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP*

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

*Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.*

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

**Your representations must be received by midnight 16 December 2024.** Please return forms to: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

## **RHAN A: Manylion cysylltu**

### **PART A: Contact details**

**Eich manylion/manylion eich cleient**  
**Your / your client's details**

**Manylion yr asiant** (os ydynt yn berthnasol)  
**Agent's details** (if relevant)

Enw Name	Mr & Mrs Beynon	Darren Brown
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Associate
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	Trefloyne Manor	Mango Planning & Development Ltd
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)	Darren Brown on behalf of Mr & Mrs Beynon	



Dyddiad Date	12th December 2024
<b>RHAN B: Eich sylw</b> <b>PART B: Your representation</b>	
Eich enw / sefydliad Your name / organisation	Mr Darren Brown Mango Planning & Development Ltd
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>	
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	Policy GN 55 - Serviced and Hotel Accommodation Policy GN 56 – Caravan, Camping and Chalet Development Policy GN 58 – Self Catering Accommodation
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	Please refer to covering letter
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	
Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma. If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.	
<b>2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>	
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	x



<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i></p> <p>I think that the procedural requirements have not been met.</p>		
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</b></p> <p><i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b></p> <p>Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i></p> <p>New site allocation</p>		X
<p><i>Polisi newydd</i></p> <p>New policy</p>		X
<p><i>Paragraff neu destun ategol newydd</i></p> <p>New paragraph or supporting text</p>		X
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b></p> <p><b>4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).</b></p>		
<p><i>Enw'r safle</i></p> <p>Site name</p>		
<p><i>Cyfeiriad y cais</i></p> <p>Site reference</p>		
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.</p>		



### 5. Rhestrwch eich sylwadau isod.

*Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.*

### 5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Please refer to covering letter

*Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*

x

Tick here if you are submitting additional material to support your representation.

### 6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

*Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.*

### 6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

*Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

*Rwyf am siarad mewn sesiwn gwrandawriad.*

x



I want to speak at a public hearing.	
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i></p> <p>If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
Tourism	
<p><b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i></p> <p>I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i></p> <p>I wish to be heard in English.</p>	x





## Nodiadau cyfarwyddyd

### Guidance notes

*Caiff Cynllun Datblygu Lleol Cyngor Sir Penfro ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

*'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:*

*1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*

*2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*

*3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

*Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.*

*Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.*

*Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/broffion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.*

*Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.*

*Os ydych yn ceisio am fwy nag un newid i'r*

The Pembrokeshire County Council Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

*Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.*

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.





12th December 2024

Pembrokeshire County Council  
The Development Plans Team  
County Hall  
Haverfordwest  
Pembrokeshire  
SA61 1TP

Dear Sir

On behalf of Mr And Mrs Beynon  
Trefloyne Manor, Trefloyne Lane, Tenby, SA70 7RG  
Pembrokeshire County Council Deposit Local Plan 2 Representations

Please find enclosed representations in respect of the Pembrokeshire County Council Deposit Local Plan 2 ("LDP2") on behalf of our client Mr and Mrs Beynon, the owners of Trefloyne Manor, Tenby.

#### Context to the representations

Trefloyne Manor is a well-established leisure and tourist destination centred on a parkland golf course. It extends to an area of approximately 84 hectares and is located approximately 2 km to the south-west of Tenby.

Trefloyne Manor is an award winning tourist destination. The site comprises presently of the main manor house with 5 serviced boutique guest rooms, including a family suite for 2 adults and 2 children, a bar and the Orangery restaurant, which has 2 AA Rosettes for culinary excellence.

In addition, there are a further 7 serviced guest rooms set around the courtyard in converted outbuildings, together with a 3-bedroom serviced/self-serviced loft apartment in the former club house.

Set within the tree bank to the south of the main house are 11 self-catering "Scandinavian" lodges. All lodges are 3 bedroomed, sleeping 6 guests.

Trefloyne operates as both a serviced and self-catered tourism destination. All accommodation on-site is 5 Star (graded and accredited by Visit Wales and The AA).

The former Dovecote has been repurposed to provide a wellness retreat. More recently, planning permission has been granted for a new club house, which in addition to changing facilities and a pro-shop will provide a leisure complex and bar/lounge and restaurant. The development of the club house will deliver a £5 million investment in the destination.

The site sits within a wide and shallow valley defined by The Ridgeway and Trefloyne Wood to the south, Longbury Bank to the east, the former Trefloyne quarries to the north and agricultural land further to the north and west.

Since acquiring Trefloyne Manor in July 2004, Mr and Mrs Beynon have undertaken significant investment and improvements across the site as a whole with the primary objective of encouraging visitors to stay longer, increase spend in the local economy and to visit outside of peak season.

Trefloyne Manor is now recognised as a premium leisure/tourist and golf destination, adding to the quality and choice of tourism accommodation in Tenby, on a year round basis. The proposed club house, which is scheduled for commencement in early 2025, will further enhance the facilities found on-site. Completion is anticipated in 2026.

It is the intention of Mr and Mrs Beynon to further expand upon the existing high-quality accommodation at Trefloyne to provide support for the golf course facility and to help sustain Trefloyne's operation throughout the year.

### National Policy

The proposed expansion of an existing high quality tourism destination is compliant fully with the aims and objectives of Planning Policy Wales (Edition 12), which at paragraph 2.4 highlights that the rural countryside provides an economic and environmental base for tourism to thrive.

Further, PPW acknowledges that a "Resilient Wales" is supported by tourism. Paragraph 5.5.1 under "Tourism", PPW states:

*"Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection."*

Further, paragraph 5.5.2 acknowledges that the planning system encourages tourism where it contributes to economic development.

Importantly, at paragraph 5.5.3 PPW states: *"In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. In addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate. Here development should be sympathetic in nature and scale to the local environment."*

### Deposit Local Plan 2

Mr & Mrs Beynon support the Council's recognition of the importance of the tourism industry as set out in Policy SP 17 Visitor Economy.

However, in order to provide the certainty that the Beynon's require to make the significant investment that these proposals require, it is requested that the Local Plan be modified in two ways: Firstly, to recognise the potential for alternative accommodation to meet the requirements for additional accommodation; and secondly, to provide express support for further high quality tourist accommodation and associated facilities at Trefloyne Manor through recognition as an existing tourist destination, where further development will be supported, subject to compliance with technical matters.

The specific changes sought in these representations concern Policies GN 55, GN 56 and GN 58 and supporting text thereto.

#### *Policy GN 55 – Serviced and Hotel Accommodation*

Proposed Policy GN 55 states:

*“Proposals for serviced or hotel accommodation (excluding caravan or chalet accommodation) will be permitted where:*

*A. For new developments either:*

- 1) It is within or is adjacent to a Town, Service Centre or Service Village; or*
- 2) The proposal is for the conversion of an existing dwelling, a historic building or a traditional agricultural building.*

*B. For extensions to existing businesses:*

*The scale, type, character, design, layout and nature of the proposal, including the extension, must be compatible with its location and acceptable in terms of landscape capacity and should reflect and respect the role and function and sense of place of the area”.*

It is respectfully requested that emerging Policy GN 55 be revised as follows (proposed new wording underlined):

*“Proposals for serviced or hotel accommodation (excluding caravan or chalet accommodation) will be permitted where:*

*A. For new developments either:*

- 1) It is within or is adjacent to a Town, Service Centre or Service Village or part of an existing tourist accommodation facility; or*
- 2) The proposal is for the conversion of an existing dwelling, a historic building or a traditional agricultural building.....”*

#### *GN 56 Caravan, Camping and Chalet Development*

Proposed Policy GN 56 states:

*A. New medium or large-scale caravan, camping and chalet proposals, will be permitted where each of the following criteria can be satisfied:*

- 1. They are proposed to be sited within or adjacent to a Service Village, a Service Centre or a Town; and*
- 2. They are in locations deemed acceptable in landscape capacity terms.*

*B. New small scale caravan, camping and chalet proposals, will be permitted where they are in locations deemed acceptable in landscape capacity terms.*

*C. Upgrades or extensions to existing sites will be permitted where the overall scale and additional numbers of units or pitches is acceptable in landscape capacity terms, and where the scheme delivers environmental enhancements.*

*In all cases:*

- 1. Proposals should be of high quality in terms of design, layout and appearance;*
- 2. Proposals should not result in an over-concentration of sites within an area;*
- 3. Proposals should not result in an excessive area of hard standing being created; and*
- 4. Appropriate landscape mitigation measures will be required wherever they.*

We respectfully request that the proposed wording of Policy GN 56 be revised to take account of a number of considerations.

Firstly, while the policy itself does not say so, the supporting text to it highlights that the Council's application of emerging Policy GN 56 at (C)(2) will be entirely upon a draft SPG referred to as "Caravan, Camping and Chalet Landscape Capacity Assessment", which is also under consultation.

This draft SPG, relied upon in this way, will effectively identify areas where development should and should not occur, and the scale of such development. Under principles set by the High Court in *Wakil (Wakil v LB Hammersmith [2012] EWHC 1411 (QB))* this is not permitted. Documents that direct where development should and should not go must be subject to and part of the statutory development plan evaluation process, not outside it. It is unfair and unreasonable to consult on a policy the teeth of which will come in a separate document that is not subject to statutory consultation and environmental assessment, and the content of which is not yet known.

Moreover, reliance on this document, being a necessarily broad brush assessment, runs contrary to the principle that applications should be considered on their own merits in accord with the development plan.

This issue may be addressed by making allowance for site specific assessment by applicants of the concentration of sites in the vicinity of a specific application site. This would also be in line with Welsh Government's objective of supporting tourism development in rural areas.

For example, Trefloyne could accommodate further self-catering proposals in a sensitive location that is visually unobtrusive with minimal impact on the landscape and areas of ecological and archaeological importance.

It is therefore requested emerging Policy GN 56 be revised as follows (proposed new wording underlined and struck through) :

*"A. New medium or large-scale caravan, camping and chalet proposals, will be permitted where each of the following criteria can be satisfied:*

- 1. They are proposed to be sited within or a Service Village or an existing tourist accommodation location, a Service Centre or a Town; and*
- 2. They are in locations deemed acceptable in landscape capacity terms.*

*B. New small scale caravan, camping and chalet proposals, will be permitted where they are in locations deemed acceptable in landscape capacity terms.*

*C. Upgrades or extensions to existing tourism accommodation sites will be permitted where the overall scale and additional numbers of units or pitches is acceptable in landscape capacity terms, and where the scheme delivers environmental enhancements.*

*In all cases:*

- 1. Proposals should be of high quality in terms of design, layout and appearance;*
- 2. Proposals should not result in an over-concentration of sites within an area;*
- 3. Proposals should not result in an excessive area of hard standing being created; and*
- 4. Appropriate landscape mitigation measures will be required wherever they”.*

#### *GN 58 Self Catering Accommodation*

Proposed Policy GN 58 states:

*“Self-catering accommodation will be permitted where it is located within a Town, Service Centre, Service Village or Local Village as defined in the Plan’s settlement hierarchy.*

*Proposals will be expected to demonstrate that there is an appropriate balance in the settlement between housing as main, primary residences (Use Class C3), secondary residences (Use Class C5) and short-term holiday lets (Use Class C6).*

*Proposals for self-catering accommodation that is located outside the above locations will only be permitted where it involves the re-use and / or adaptation of an existing traditional building (see Policies GN 13 & GN 34). New-build self-catering proposals will not be permitted in the countryside.*

*All proposals should reflect and respect the role and function and sense of place of the area, most notably in terms of scale, type, character, design, layout and appearance - as well as those uses already located in the vicinity of the site”*

It is requested emerging Policy GN 58 be revised to take account of opportunities for tourist accommodation at existing established tourist locations that are not within or adjacent to existing settlements (proposed new wording underlined) as follows:

*“Self-catering accommodation will be permitted where it is located within or well related to a Town, Service Centre, Service Village or Local Village as defined in the Plan’s settlement hierarchy or at established tourist accommodation locations.*

*Proposals will be expected to demonstrate that there is an appropriate balance in the settlement between housing as main, primary residences (Use Class C3), secondary residences (Use Class C5) and short-term holiday lets (Use Class C6).*

*Proposals for self-catering accommodation that is located outside the above locations will only be permitted where it involves the re-use and / or adaptation of an existing traditional building (see Policies GN 13 & GN 34). New-build self-catering proposals will not be permitted in the countryside with the exception of lodges.*

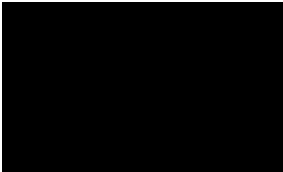
*All proposals should reflect and respect the role and function and sense of place of the area, most notably in terms of scale, type, character, design, layout and appearance - as well as those uses already located in the vicinity of the site”*

Finally, it is respectfully requested that Trefloyne Manor be recognised specifically as a tourist destination where further tourist related development is acceptable, subject to compliance with technical matters.

As drafted, the LDP2 precludes existing well established tourist destinations from further expansion to provide much needed accommodation in the County to further expand and drive forward tourism in the County on a year round basis. It is requested respectively that the LDP2 be revised accordingly to enable existing award winning tourist sites to expand appropriately.

I trust that the enclosed information is sufficient to register the representation. Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Darren Brown

Associate

Encs.



**Trefloyne Manor, Trefloyne Lane, Tenby**  
**Proposed tourist accommodation site allocation**  
**Sustainability Appraisal**

<b>SA Objective</b>	<b>Commentary</b>	<b>Does the proposal contribute to meeting the SA objective?</b>	<b>Is the proposal compatible with the SA objective?</b>
1. Develop & maintain a balanced population structure.	No direct relationship between the proposal and this objective but it could be compatible for the visitor economy, which can help maintain a balanced population structure.		x
2. Promote & improve human health & well-being through a healthy lifestyle, access to healthcare & recreation opportunities & a clean & healthy environment.	The proposal can help promote access to a clean and healthy environment and recreational breaks and can help with well-being and general health.	x	x
3. Improve education opportunities to enhance the skills & knowledge base.	The proposal could help improve education opportunities through apprenticeships during construction and operational phases.	x	x
4. Minimise the need to travel and encourage sustainable modes of transport.	The proposal is in a sustainable location and could help reduce the need to travel and/or encourage sustainable alternatives to travelling by car.	x	x
5. Provide a range of high quality housing including affordable housing to meet local needs.	No direct relationship between the proposal and this objective.		

6. Build safe, vibrant & cohesive communities which have improved access to key services and facilities.	No direct relationship between the proposal and this objective but it could be compatible as a successful visitor economy can help support and maintain a safe and vibrant community.		x
7. Protect & enhance the role of the Welsh Language & culture.	The proposal could help protect and enhance Welsh language and culture.	x	x
8. Provide a range of good quality employment opportunities accessible to all sections of the population.	The proposal can help provide a range of quality employment opportunities during construction and operation.	x	x
9. Support a sustainable & diverse local economy	The proposal can help protect and enhance the local economy by improving and extending an all year round tourist destination	x	x
10. Prepare for & reduce the impact of Pembrokeshire's contribution to climate change.	The proposal seeks to promote sustainability and is therefore in line with the objective.	x	x
11. Maintain & improve air quality.	No direct relationship between the proposal and this objective but it could be compatible.		x
12. Minimise the generation of waste & pollution.	The proposal seeks to promote a highly sustainable tourist facility which can help with this objective.	x	x

13. Encourage the efficient production, use, reuse & recycling of resources.	The proposal can help with the efficient production, use and reuse of resources.	x	x
14. Maintain & protect the quality of inland & coastal water.	No direct relationship between the proposal and this objective but it could be compatible.		x
15. Reduce the impact of flooding & sea level rise.	No direct relationship between the proposal and this objective but it could be compatible.		
16. Use land efficiently & minimise contamination.	The proposal will make appropriate use of land efficiency and minimise contamination.	x	x
17. Safeguard soil quality & quantity.	No direct relationship between the proposal and this objective but it could be compatible.		x
18. Maintain, enhance & value biodiversity & promote the resilience of ecosystems.	The proposal will take account of the rich ecology and Biodiversity at Trefloyne and will help maintain and improve biodiversity and ecosystems.	x	x
19. Protect & enhance the landscape & geological heritage.	The proposal will protect and enhance the landscape and geological heritage by ensuring the facilities are carefully located to minimize impact on	x	x

	the landscape and heritage of the site.		
20. Encourage quality locally distinct design that complements the built heritage.	The proposal seeks to promote the highest quality design in terms of layout, materials and sustainability which sits well within the setting.	x	x
21. Protect, enhance & value the built heritage & historic environment.	The proposal will seek to protect the built heritage and historic environment and, as such, will meet this objective.	x	x
In summary, the proposed tourist accommodation allocation can further support the visitor economy through growth of an established tourist destination at an appropriate location, which can meet the Sustainability Assessment requirements.			



LOCATION PLAN - TREFLOYNE MANOR AND GOLF CLUB

