

Application Ref: NP/22/0513/FUL

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|----------------------|---|--------------------|-------------|
| Case Officer | Kate Attrill | | |
| Applicant | Mr & Mrs M & C Harris, Newgale Campsite | | |
| Agent | Mr A Vaughan-Harries, Hayston Development & Planning Ltd | | |
| Proposal | Demolition of existing toilets/shower/store/laundry & removal of touring caravans for reception to an alternative site outside the flood zone with expansion, replacement toilets/showers/store/laundry room, reception/office & meeting room, creation of 12 grass tent plateaus (retrospect), erection of security cctv flagpole, conversion of relinquished public toilet block to takeaway cafe/ice cream parlour with small extension to create a replacement public toilet & associated works | | |
| Site Location | Newgale Camping Site, Newgale, Haverfordwest, Pembrokeshire, SA62 6AS | | |
| Grid Ref | SM85062190 | | |
| Date Valid | 12-Jan-2023 | Target Date | 08-Mar-2023 |

This application is being brought to the Development Management Committee Members as the Director with responsibility for planning considers that it raises matters of public interest.

Consultee response

The National Trust: Objecting

PCNPA Buildings Conservation Officer: No Objection to setting of Listed Buildings .

PCC - Coastal and Rivers Engineer: Observations

PCC - Access Officer: Observations

PCC - Transportation & Environment: No objection

Coal Authority: No objection

Dwr Cymru Welsh Water: Conditional Consent

PCNPA Tree and Landscape Officer: Conditional Consent

PCC - Drainage Engineers: Observations

Natural Resources Wales: Concern - We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding Landscape. If this information is not provided, we would object to this planning application.

Public Response

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

The application has also been advertised as a Departure from Local Planning Policy due to part of the site being in the Coastal Change Management Zone.

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One letter of objection from a local resident has been received and two letters of support have been received from properties in South Wales.

The National Trust have registered their objection to both the design and scale of the proposed building and to the principle of development within the flood zone.

One letter details concerns of a restrictive covenant regarding retail operations on the site which the writers have been advised is not a material planning consideration but would be a civil matter.

Policies considered

Future Wales: The National Plan 2040

Pembrokeshire Coast National Park Local Development Plan 2

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

[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 10 - Sites and Species of European Importance

LDP2 Policy 11 - Nationally Protected Sites and Species

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 32 - Surface Water Drainage

LDP2 Policy 34 - Flooding and Coastal Inundation

LDP2 Policy 35 - Development in the Coastal Change Management Plan

LDP2 Policy 38 - Visitor Economy

LDP2 Policy 41 - Caravan, Camping & Chalet Development

LDP2 Policy 55 - Infrastructure Requirements

LDP2 Policy 59 - Sustainable Transport

LDP2 Policy 60 - Impacts of Traffic

PPW11

SPG03 - Landscape

SPG08 - Seascape Character

SPG11 - Caravan Camping & Chalet

SPG12 - Biodiversity

SPG16 - Sustainable Design & Development

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TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 14 - Coastal Planning
TAN 15 - Development and Flood Risk
TAN 23 - Economic Development

Constraints

NPA Property - within 25m
Special Area of Conservation - within 500m
LDP Mineral Safeguard
Biodiversity Issue
Safeguarding Zone
Rights of Way Inland - within 50m
Hazardous Zones
Potential for surface water flooding
Recreation Character Areas
Low Coal Risk
Surface Coal
High Coal Risk
Affordable Housing Submarkets
Seascape Character Areas
Landscape Character Area

Officer's Appraisal

Site and Context

Newgale campsite is located alongside the A487 which runs immediately behind the shingle bank of Newgale beach. The majority of the site is located within a floodplain and is visually prominent within the landscape of the National Park, due to its positioning at the coastal end of an open valley extending inland towards Rhyndaston Mountain, affording widespread views from many vantage points between. It is also prominent in near views along the A487 as it sits alongside the main road between Haverfordwest and St David's.

Relevant Planning History

NP/98/349 Certificate of Lawfulness as a camping site for tents and dormobiles, Certificate granted October 1998
NP/00/052 Toilet Block Extension - approved
NP/07/450 Toilet block Extension - approved
NP/19/0297/CLE - Use of campsite land for stationing of single mobile catering unit (for sale of hot & cold food & non-alcoholic drinks from 7am to 11pm) from beginning of June (weekends only) and 7 days a week from beginning of school holidays until September each year for use of occupiers of campsite only - Approved

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PA/19/0152 Pre-application inquiry was submitted in September 2019 in regard to the previously refused proposals. The response was as follows:

‘Having carefully considered the submitted documents, I can confirm that there is no objection in principle to the replacement/upgrading of the existing toilet and shower facilities, but the level of replacement proposed is over and above what could be considered to be reasonably necessary.

The creation of a two-storey gable ended, balcony fronted building is not considered to preserve the special qualities of the National Park and introduces an overly suburban and dominant building to this area of highly sensitive landscape.’

Description of Proposal

The current proposal comprises:

- Demolition of existing toilets/shower/store/laundry
- Removal of touring caravans for reception to an alternative site outside the flood zone with expansion (not currently authorised)
- A replacement partly 1 storey and partly 2 storey building to house toilets/showers/store/laundry room, reception/office & meeting room
- Creation of 12 grass tent plateaus at the south-eastern end of the site (retrospective),
- The erection of a 9.14 metre security CCTV flagpole,
- Conversion of public toilet block to takeaway cafe/ice cream parlour with extension to create a replacement public toilet & associated works

This is a revised application following an application in 2020 which was refused under delegated powers under reference number: NP/20/0220/FUL.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Landscaping & Biodiversity
- Land Drainage
- Other Material Considerations: Accessibility

Policy

Future Wales – The National Plan 2040 (FW which was adopted on 24th February 2021) is the National Development Framework for Wales, and is the national tier of the Development Plan.

Policy 4 ‘Supporting Rural Communities’ states that Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies to support them.

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On page 104, Future Wales states that: “National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...” and that “Future Wales policies respect the functions of National Parks in terms of their statutory purposes...”

The application site lies outside any Centre boundary as defined by Local Development Plan 2 and is therefore classified as Countryside where development must be strictly controlled.

Policy 7 of the Plan (Countryside) sets out the types of development that are acceptable, in principle, in the countryside and include tourist attractions where the need to locate in the countryside is essential, extensions to established businesses in the countryside and assisting coastal communities in preparing for and adapting to coastal change.

The campsite lies adjacent to the coast and the main A487 road at Newgale. The existing camp site is well known for significant and continuous flooding in the winter months and the adjacent shingle ridge is regularly breached by the sea in stormy conditions. The County Council has recently commenced preparations to realign the A487 a significant distance inland following detailed studies that show that the shingle bank has a limited lifespan, following which it will retreat eastwards into what is currently the campsite.

A large part of the existing campsite lies within a C2 flood zone and within a Coastal Change Management Area (as shown on the Proposals Map). Any development in this location will have a limited lifespan due to the predicted risk of inundation from the sea and consequent flooding of this land.

The planning statement submitted as part of the application acknowledges both the current flooding and the increased risk of flooding in the future.

Policy 34: Flooding and Coastal Inundation states that development will be directed away from those areas which are at risk from flooding now or as predicted for the future by TAN15 Development Advice maps or Shoreline Management Plan 2 unless there are sound social or economic justifications in accordance with the advice set out in Technical Advice Note 15.

Policy 35: Development in the Coastal Change Management Area states that in the case of non-residential development there is a requirement to demonstrate that development will result in no increased risk to life or significant increase to property.

Policy 37: Relocation and replacement of development (other than residential) affected by coastal change allows for the relocation and replacement of facilities that are considered important to coastal communities affected by coastal change subject to a number of criteria.

Replacement Amenity Building: This proposal seeks to demolish the existing amenity building which comprises of toilets and showers and small laundry room and lies within the Coastal Change Management Area and replace it with a new building on higher ground to the southeast.

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The proposed replacement would lie outside the C2 flood zone and the Coastal Change Management Area. The proposed replacement would comprise updated shower and toilet facilities, a laundry and a takeaway kiosk (pizza café) in the single storey element of the building.

The 2-storey element of the building would comprise a 'meet and greet' reception area, ancillary retail and information area and storage on the ground floor and an office area / media room on the first floor. A balcony is also proposed for the first floor.

It is proposed that the meet and greet facility and the takeaway kiosk would replace those currently provided via a temporary caravan and mobile catering vans. The applicant has stated that the current Certificate of Lawfulness for the mobile catering vans would be relinquished should this application be considered acceptable, but no legal agreement to achieve this has been submitted to date. The Certificate of Lawfulness granted also only allows use of a single mobile catering unit from the beginning of June (weekends only) and 7 days a week from beginning of school holidays until September each year for use of occupiers of campsite only, rather than year round use.

Policy 37: Relocation and replacement of development (other than residential) affected by coastal change states that proposals for the replacement of commercial and business uses that are considered important to coastal communities affected by coastal change will be permitted, provided that: a) it can be demonstrated that the proposed development replaces that which is forecast to be affected by erosion within 20 years of the date of the proposal; and b) the new development is outside and inland of the Coastal Change Management Area and where possible it is in a location that is close to the coastal community from which it was displaced; and c) the new building or land area is comparable in size to that which it is to replace; and d) any existing buildings are demolished and the site is cleared and made safe or put to a temporary use beneficial to the local community; and e) the site meets all other criteria against which a proposal for these uses would normally be judged. The proposal is considered to comply with criteria a), b) and d).

However, the existing amenity building has a floorspace of 100 sqm whereas the proposed replacement building would have a ground floorspace of 217 sqm with an additional 28 sqm on the first floor giving a combined floorspace of 245 sqm.

This increase in floorspace is not considered to comply with criterion c) of Policy 37 by introducing additional elements to the amenity building such as the reception area, retail and information areas, takeaway kiosk and the first floor office space and balcony.

The current meet and greet facility and the mobile catering facilities are provided on a seasonal basis and are removed from the site at the end of the season. Whilst it is accepted that there is a landscape impact of these additional mobile structures when the campsite is operational, this is a temporary and seasonal impact which is removed when the campsite is closed.

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A permanent structure in a more prominent location would result in a year-round adverse visual impact which would appear even more incongruous in the landscape when the remainder of the site is clear of caravans, campervans and tents. As such it is considered that the proposal is contrary to criterion e) as it does not meet all other criteria against which a proposal for these uses would normally be judged, as the proposal is contrary to Policy 8: Special Qualities and Policy 14: Protection and Enhancement of the Pembrokeshire Coast National Park, It is also contrary to criterion b) of Policy 41 by introducing a building of a scale and design not in keeping with the character of the local area.

The proposed replacement amenity building would sit on ground that is significantly higher than the current location and would be significantly larger in both floor space and height. The current amenity building has a floorspace of 100 sqm and sits at the back of the site amongst the touring caravan pitches. The proposed building would more than double the existing floorspace and occupy a more prominent location within the site.

The planning statement acknowledges that the proposed building will make the development more visible in the landscape and proposes it will be cut into the existing slope with landscaping to mitigate the landscape impact.

Policy 42: Site Facilities on Camping, Chalet and Caravan Sites states that development of retail and other facilities will be permitted where it can be demonstrated that a) the facility is not already available in the vicinity; and b) the scale and design of the facility is in keeping with the character of the surrounding area; and c) the vitality and viability of retailing and services of nearby Centres are not adversely affected. Paragraph 4.222 of the Plan states that it is accepted that camping sites generally require good washing and toilet facilities. In addition, larger sites may justify, for example, the provision of a camp shop, office, laundry facility or games room.

The provision of catering, leisure or shopping facilities on a scale that exceeds the reasonable requirements of the occupiers of the site or which relates poorly to the size, character or location of the site will not be encouraged.

Much of the additional floorspace of the proposed amenity building is taken up by providing a takeaway facility and retail area. Policy 42 states that the development of retail and other facilities on camping, chalet and caravan sites will be permitted where it can be demonstrated that a) the facility is not already available in the vicinity; and b) the scale and design of the facility is in keeping with the character of the surrounding area; and c) the vitality and viability of retailing and services of nearby Centres are not adversely affected. Newgale has a number of facilities including a pub and a surf shop which contains a café open 7 days a week. Another established café is currently being rebuilt. It is therefore considered that takeaway food is available within the vicinity. It is therefore considered that the proposal is not in compliance with criterion a).

As set out above the introduction of this building on a year-round basis is also not considered to be appropriate and it is considered that the proposal does not comply

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with criterion b) of Policy 42 as the building is not considered to be of a scale and design in keeping with the character of the surrounding area.

Limited retail provision on the site would not affect the vitality and viability of retailing and services of nearby centres and the proposal is not considered to breach criterion c) of Policy 42. Nevertheless, the proposal is not considered to accord with Policy 42

Flagpole with CCTV Camera: The proposed flagpole with CCTV camera is proposed for the entrance to the camp site and is proposed to be 9.14 metres in height. The planning statement states that this is necessary for the security of the campsite. The proposed flagpole would sit 10 metres into the site from the entrance gates and would add an additional visual element into the landscape and would be particularly visible from the A487. It is considered that this proposal would be contrary to Policy 14 of the Plan (Conservation and enhancement of the Pembrokeshire Coast National Park) by causing visual intrusion and failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park.

Ice Cream Parlour: The application also proposes the conversion of a relinquished toilet block to an ice cream parlour with an extension to the rear to provide a replacement public toilet. The building lies wholly within the C2 flood zone and the Coastal Change Management Area. Policy 34 states that new development will be directed away from those areas which are at risk of flooding now or as predicted for the future by TAN 15 Development Advice Maps unless there are sound social or economic justifications in accordance with the advice set out in TAN15. TAN 15 directs new development away from zone C but sets out the circumstances under which non-highly vulnerable (residential) development may be permitted in Zones C1 and C2. Under the guidance given in TAN 15 it is for the planning authority to justify whether development should be permitted in this zone, provided it can be demonstrated that: “its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or ii its location in zone C is necessary to contribute to key employment objectives supported by the local authority and other key partners, to sustain an existing settlement or region; And iii it concurs with the aims of PPW and meets the definition of previously developed land; and iv the potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable.” This proposal would not in itself meet the justification criteria set out above.

Policy 35 requires that proposals for all new development or the intensification of existing development or land uses in the Coastal Change Management Area will be required to demonstrate that it will result in no increased risk to life or significant increase in risk to property, in addition to complying with all other relevant policies of the Local Development Plan. The Flood Risk Assessment submitted with the application acknowledges that the ice cream parlour would be affected by flooding, along with the risk of water overtopping the shingle bank. It also recognises that the shingle bank itself is vulnerable to breaching and accepts that the building could be lost during the next 100 years. It also acknowledges that the building is likely to be at greater risk from storm damage due to erosion of the shingle bank. It is therefore considered that the proposal is contrary to Policy 35 of Local Development Plan 2.

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Tent Plateaus (retrospective): The application seeks retrospective permission for 12 no. grass tent plateaus.

Aerial photography shows 13 no. plateaus, and the planning statement also refers to 13. In addition, whilst they are referred to as tent plateaus, the planning statement refers to them being used by dormobiles, tents and cars, providing level areas and improved disabled access. It is noted that these plateaus have been created within the permitted area of the campsite and do not constitute an extension.

The planning statement states that these areas, each between 6 to 8 metres in diameter result in a more acceptable density of units throughout the site, especially when the lower ground area is flooded. However, it should be noted that the entrance to the campsite which provides the access to the plateaus is within the C2 flood zone and Coastal Change Management Area. The plateaus are largely grassed and as such it is not considered that they create an unacceptable landscape impact. However, there is potential to mitigate the landscape impact even further by seeking enhanced landscaping, particularly on the boundaries of the area. This element of the proposal could be addressed via appropriate conditions.

Overall, the proposal is considered to be contrary to Policy 37 as the size of the proposed building is not comparable to that which it is to replace and Policy 42 by proposing facilities that are already available in the vicinity in a building of a scale and design not in keeping with the character of the surrounding area.

The proposed ice cream parlour conversion is in a flood risk zone where the risk of flooding is predicted to increase. This part of the proposal does not meet the requirements of TAN15 that set out the circumstances under which non-residential development may be permitted within a C1 or C2 flood risk area.

The flagpole with CCTV camera element is considered visually intrusive and therefore contrary to policy 14 of the Local Development Plan.

The plateau pitches element of the proposal are acceptable within policy terms but would require further landscaping to ensure compatibility with policies relating to the special qualities of the National Park.

When considered as a whole however, the proposal fails to comply with a number of key policies of the LDP and the principle of the development as currently proposed is not supported.

Siting, Design and Impact upon the Special Qualities of the National Park

Planning Policy Wales (Edition 11), references the need for good design and states that 'meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales.

PPW goes on at 6.3.9 to state: 'The special qualities of designated areas should be given weight in the development planning and the development management

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process. Proposals in National Parks and AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered’.

TAN 12 (Design) at 2.5 makes the point that ‘good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation – embracing sustainability, architecture, place making, public realm, landscape, and infrastructure.

TAN 12 (Design) at 2.6 states that “Design which is inappropriate in its context, or which fails to grasp opportunities to enhance the character, quality and function of an area, should not be accepted, as these have detrimental effects on existing communities”.

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan 2 (LDP2) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

Policy 14 of the Plan seeks to conserve and enhance the Pembrokeshire Coast National Park and states that development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by a) causing visual intrusion; and/or b) introducing or intensifying a use which is incompatible with its location; and/or failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or losing or failing to incorporate important traditional features.

Policy 29 of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).

The site lies within Landscape Character Area 12: St. Brides Bay and Seascape Character Area and within Seascape Character Area 21: St. Brides Bay Coastal Waters East. The Authority’s Supplementary Planning Guidance on both Landscape and Seascape Character state that the area’s key characteristics are the long sandy beaches with low rolling hills running back from the coast with wide views at the sea edge along Newgale Sands. The coastal features here provide a strong sense of place. The Seascape Character Assessment states that development pressure and visitor activity at Newgale affects the scenic quality of the seascape.

The Landscape Character Assessment gives guidance for the management of the area and states that tourism developments should be sites and designed to avoid adverse landscape and visual impacts. It is considered that the proposal for the replacement amenity building would not be in keeping with this management guidance.

The proposed building would be highly visible from all approaches into Newgale, as well as from the road adjacent to the site and from the shingle ridge. It is also considered that the siting on higher ground along with part of the building being 2 storey will increase the visual impact of the site when viewed from the beach. It is

considered that the proposal, by means of its significant increase in the size of the building, the 2-storey element and its siting on higher ground would therefore be contrary to Policy 14 of the Plan.

The Landscape Character Areas were used as a basis for a study undertaken as part of the evidence base for LDP2 and which is now published as Supplementary Planning Guidance to the Plan. This document details that there is only limited capacity for further development of sites because “some existing sites act as detractors visible from the sea and Coast Path and the openness of this area and the sloping land towards the coast mean that further development along the coast and direct hinterland would adversely affect its character.”

The proposed building is best described as industrial in appearance and materials, and fails to respect the character of this rural, coastal landscape. Although the National Trust objection refers to the potential for increased coastal erosion as a result of the creation of the plateaus, the Planning Officer does not consider that this would be a defensible reason for refusal and believes this aspect of the proposal could be adequately controlled through the imposition of landscaping conditions.

The proposed CCTV pole/flagpole is also considered to be to the detriment of the wider landscape, and its necessity is questioned given that the gate entrance already has a built-in security camera. The poles would create visually intrusive and detractive elements not considered appropriate in such a sensitive landscape. Although there are permitted development rights in place for the erection of flagpoles, these relate to sites within the curtilage of a building, and do not therefore apply here.

The proposed design is considered to be neither characteristic of the local area, to cause significant visual intrusion, is poorly designed in terms of local place and distinctiveness and thus is contrary to Policies 8, 14 & 29 of the Local Development Plan.

Landscaping & Biodiversity

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

The Authority's Tree and Landscape Officer has been consulted with regards to the submitted application details, and a condition requiring further information to be secured has been suggested. The further information required comprises:

Clarification of planting / landscaping proposals

- Scale plan on proposed site layout showing precise site-specific locations
- Schedules of plants (trees and hedges)
- Plant species
- Plant supply sizes
- Proposed numbers of each proposed species
- Hedge planting density and method (e.g. double staggered)
- Implementation programme / timescale / phasing of planting

- Management and replacement of failures details

Enhanced landscaping can also enhance biodiversity but consideration of whether the location and proposed species are likely to survive frequent flooding events should also be given consideration in the final scheme.

Land Drainage

The Coastal and Rivers Engineer at Pembrokeshire County Council has made the following comments:

‘Whilst not located within the application site, it would appear that the Meet and Greet area is located in close proximity of a C2 area as defined by the TAN 15 Development Advice Maps, which includes the access from the A487 together with the proposed Ice Cream Parlour in their entirety.

.....

The A487 Public Highway is protected on its seaward side by a natural shingle bank, which acts as a flood barrier and coast defence asset. It further protects land to the east which includes the camping site from the effects of tidal flooding. During periods of high tide and accompanying tidal surge in conjunction with severe weather events, failure of the structure due to overtopping results in shingle being deposited on the highway, together with resultant floodwaters which necessitates the closure of the A487 highway to enable the shingle bank being re-profiled.

Section 9.47 of The Planning Statement and Justification Report states “The Shoreline Management Plan has a policy of hold the line for the next 50 years but a do-nothing policy from 50 years and 100 years with 20 to 35 metre of predicted erosion”.

However, this is incorrect as the West of Wales Shoreline Management Plan 2 states that in Policy Unit 2.11, the current epoch is Managed Realignment (MR) and to manage shingle on the road but with the long-term intent of allowing the shingle ridge to behave naturally, with the epoch changing to No Active Intervention (NAI).

A recent report commissioned by Pembrokeshire County Council concluded that the shingle bank will become increasing unstable and vulnerable to failure, with a timescale with a likelihood that by 2030 the current situation may become unsustainable. Therefore, until becoming unviable due to engineering and or cost constraints, Pembrokeshire County Council will continue to clear the highway of shingle and to reinstate the crown of the shingle defences. The applicant should be made aware that increased incidents of flooding together with failures of the sea defences would affect the camping area’.

The Drainage Engineers at Pembrokeshire County Council have also been consulted with the development proposals.

From 7th January 2019, all new developments of more than 1 property or where the construction area that has drainage implications is 100 square metres or more, will require sustainable drainage systems (SuDS) for surface water. The SuDS must be designed and built in accordance with Statutory SuDS Standards published by the

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Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SuDS Approving Body (SAB) role, before construction work begins. Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres; the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

The Drainage Engineers have commented that:

‘It should be noted that if an application for SAB approval has not been made and subsequently approved by the SAB Team as part of a formal SAB Application, we may not be able to support any future application for the discharge of any surface water drainage related condition in connection with this development since any proposals submitted for the discharge of the condition may be subject to change in order to meet Welsh Governments Statutory Standards for Sustainable Drainage Systems’.

Other Material Considerations

Access: The public sector equality duty section (Section 149) of the Equality Act (2010) must be considered when granting planning permission for any development.

The Welsh Government and local authorities have a duty to implement the UN Convention on the Rights of Persons with Disabilities (CRPD) in order to safeguard and promote disabled people’s rights.

In addition, the Welsh Government’s Framework for Action on Independent Living imposes extra duties on public sector organisations in Wales to improve opportunities for disabled people to access services and facilities.

In short, public authorities have a duty to:

- advance equality of opportunity
- eliminate discrimination and harassment
- promote positive attitudes
- encourage participation by disabled people

The Access Officer at Pembrokeshire County Council has commented on the application and queried whether the proposed first floor is accessible to anyone with mobility issues, whether a lift should also be provided, and made a number of recommendations to make the new shower and toilet block more accessible to all.

Conclusion

The proposed replacement amenity building is contrary to Policies 8, 14 and 29 by introducing development that would have an unacceptable adverse effect on the qualities and special landscape character of the Pembrokeshire Coast National Park.

The proposal is also contrary to Policy 37 as the size of the proposed building is not comparable to that which it is to replace and Policy 42 by proposing facilities that are already available in the vicinity in a building of a scale and design not in keeping with the character of the surrounding area.

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The proposed ice cream parlour conversion is in a flood risk zone where the risk of flooding is predicted to increase. The proposal does not meet the requirements of TAN15 that set out the circumstances under which non-residential development may be permitted within a C1 or C2 flood risk area.

The proposal is also contrary to Policy 35 of LDP2 that requires non-residential development in a coastal change management area to demonstrate that there will be no significant risk to property.

The grass tent areas are considered to be acceptable, in principle, subject to the provision of enhanced landscaping to boundaries, but are not able to be approved as a part of this application, which must be considered in its entirety.

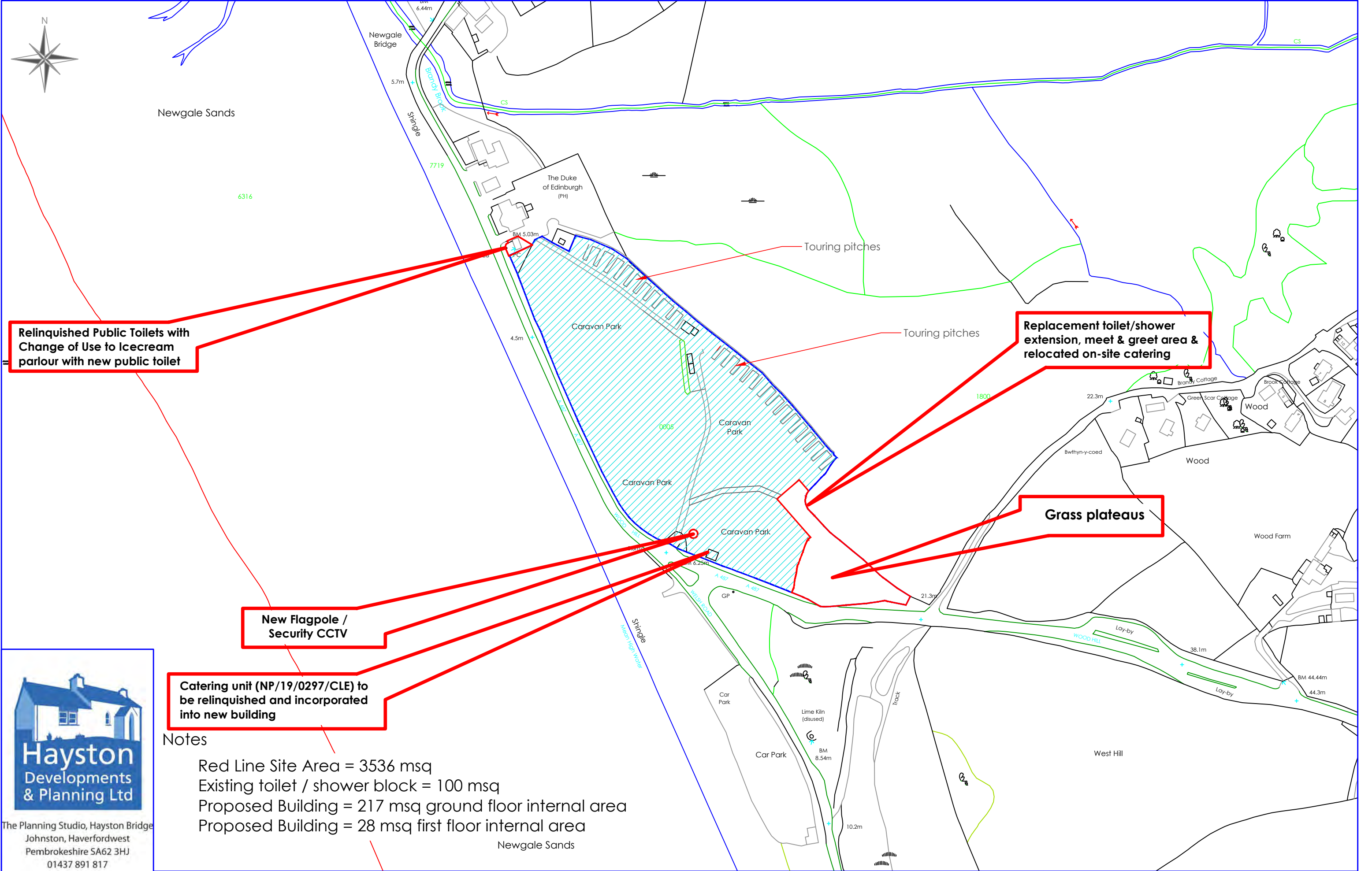
The flagpole with CCTV camera element is considered visually intrusive and therefore contrary to policy 14 of the Local Development Plan.

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

Recommendation

REFUSE, for the following reason(s):

1. The bulk, scale and form of the proposed replacement building and CCTV camera are considered to represent incongruous and unsympathetic features in this sensitive landscape.
The proposed replacement amenity building is therefore contrary to Policies 8 , 14 and 29 of the adopted Pembrokeshire Coast National Park Local Development Plan 2 by introducing development that would have an unacceptable adverse effect on the qualities and special landscape character of the Pembrokeshire Coast National Park.
The proposal is contrary to the adopted Pembrokeshire Coast National Park Local Development Plan 2 Policy 37 as the size of the proposed building is not comparable to that which it is to replace and Local Development Plan 2 Policy 42 by proposing facilities that are already available in the vicinity in a building of a scale and design not in keeping with the character of the surrounding area.
2. The proposed ice cream parlour conversion is in a flood risk zone where the risk of flooding is predicted to increase. The proposal does not meet the requirements of Welsh Government Technical Advice Note 15 that set out the circumstances under which non-residential development may be permitted within a C1 or C2 flood risk area. The proposal is also contrary to the adopted Pembrokeshire Coast National Park Local Development Plan 2 Policy 35 that requires non-residential development in a coastal change management area to demonstrate that there will be no significant risk to property.





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Notes

Red Line Site Area = 3536 msq
Existing toilet / shower block = 100 msq
Proposed Building = 217 msq ground floor internal area
Proposed Building = 28 msq first floor internal area

Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet. Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building. at Newgale Camp Site, Newgale, Pembrokeshire

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|-------------------------------------|------------|----------------------|--------------------|----------------------|--------------------------|
| Designed by | Checked by | File name AVH_847 | Date 04.05.2022 | Scale A3 - 1:2500 | Client Mr Mike Harris |
| Drawing Title Site Location Plan | | | | | |
| Page 201 of 251 | | | | | Dwg No 01a |



Campsite Entrance with Indicative Flagpole/CCTV Pole

Original Un-edited Image



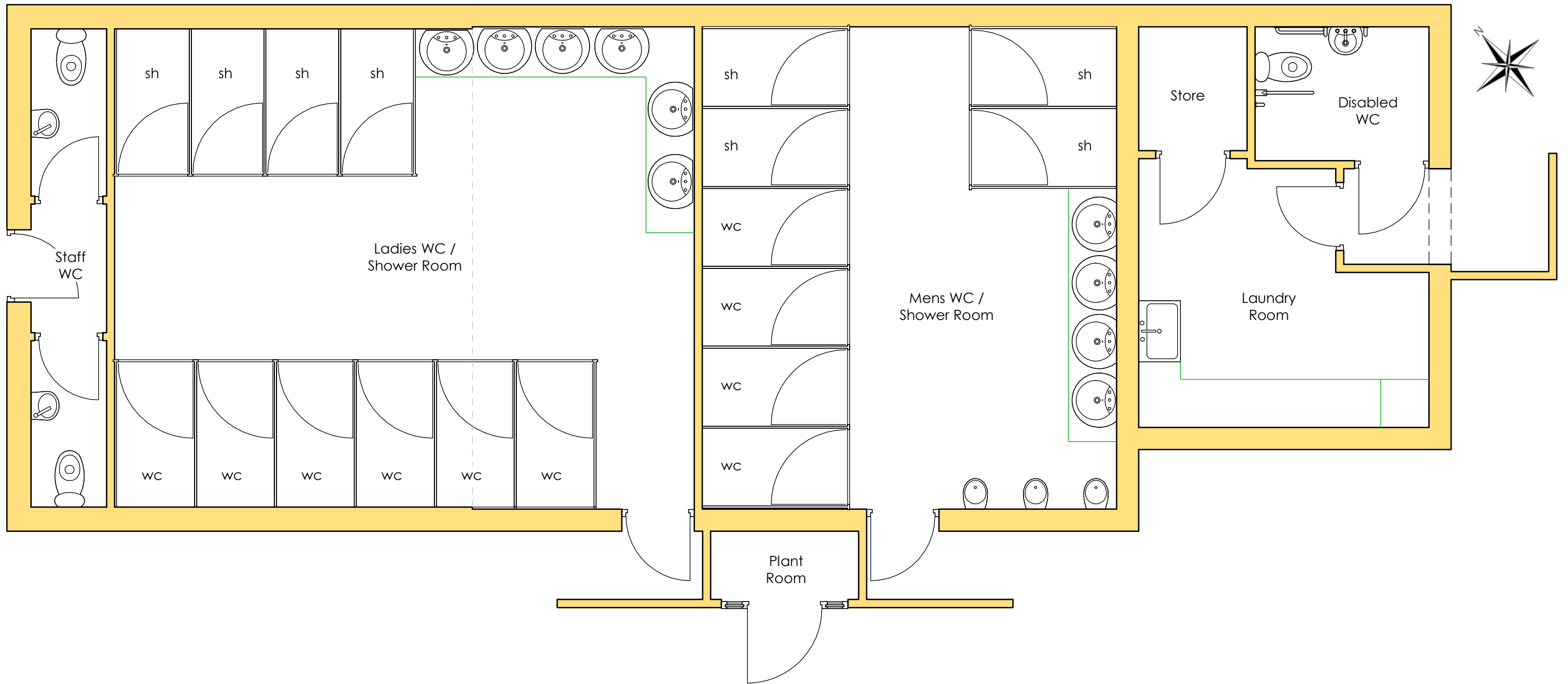


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Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet at Newgale Camp Site, Newgale, Pembrokeshire

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|---|------------|----------------------|--------------------|----------------------|--------------------------|
| Designed by | Checked by | File name AVH_847 | Date 04.05.2022 | Scale A3 - 1:2500 | Client Mr Mike Harris |
| Drawing Title Photo Montage - Campsite Entrance with Indicative Flagpole/CCTV Pole together with New Meet & Greet in Background | | | | | |
| Page 202 of 251 | | | | | 16b |

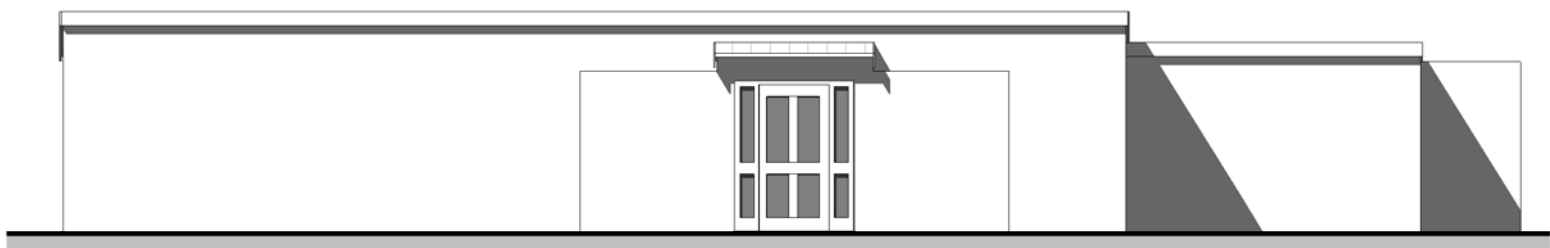


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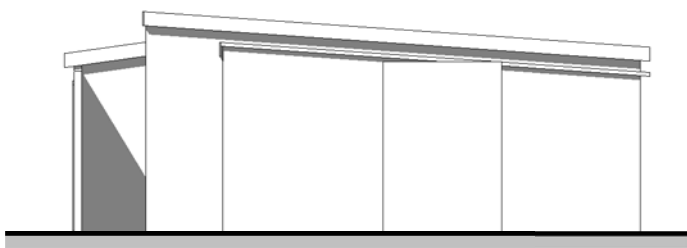
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Demolition of Existing Toilets/Shower/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Shower/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet. Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building.
at Newgale Camp Site, Newgale, Pembrokeshire

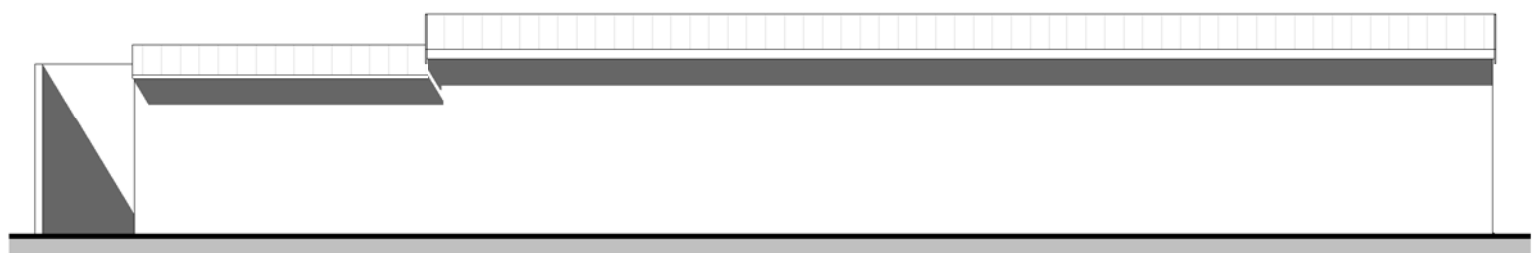
| Existing Floor Plan | | |
|---------------------|----------------|--|
| Project number | AVH_847 | <div>06a</div> <div>Scale 1 : 50</div> |
| Date | 04.05.2022 | |
| Client | Mr Mike Harris | |
| Checked by | ' | |



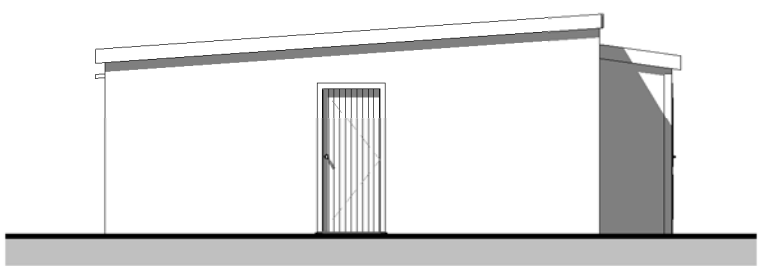
SouthWest



SouthEast



NorthEast



NorthWest

Existing toilets / showers being demolished
with land reinstated upon completion of new scheme

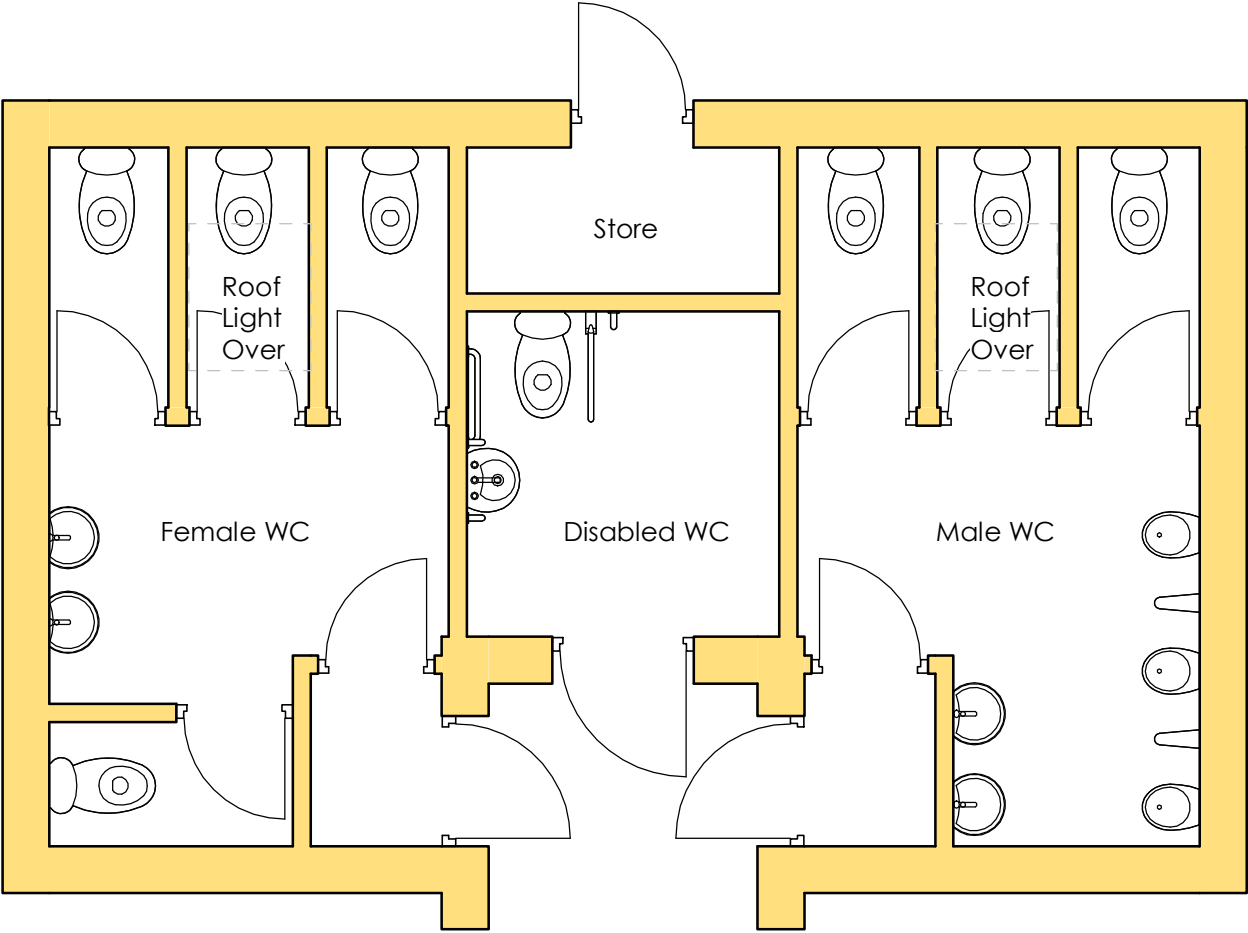


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| No. | Description | Date | <div>Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet. Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building. at Newgale Camp Site, Newgale, Pembrokeshire</div> |
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| Existing Elevations | | |
|---------------------|----------------|----------------|
| Project number | AVH_847 | <div>07a</div> |
| Date | 04.05.2022 | |
| Client | Mr Mike Harris | |
| Checked by | | Scale 1 : 100 |

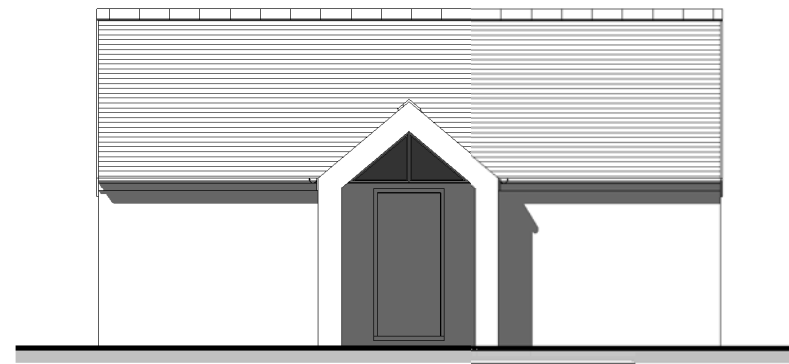


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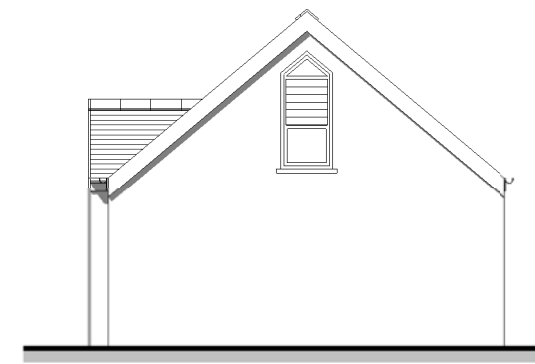
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Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet.
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at Newgale Camp Site, Newgale, Pembrokeshire

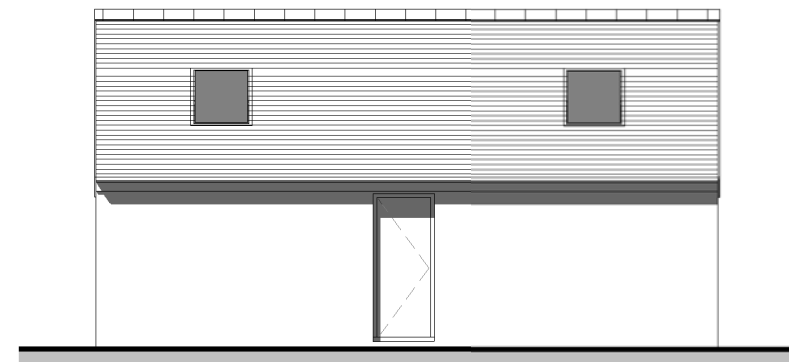
| Existing Floor Plan - Relinquished Toilet Block | | |
|---|----------------|----------------|
| Project number | AVH_847 | <div>18a</div> |
| Date | 04.05.2022 | |
| Client | Mr Mike Harris | |
| Checked by | ' | |
| Scale | | 1 : 50 |



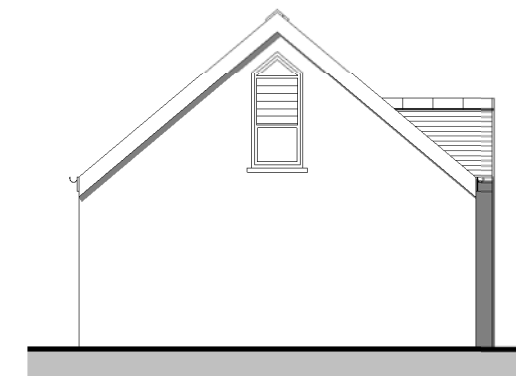
SouthWest



SouthEast



NorthEast



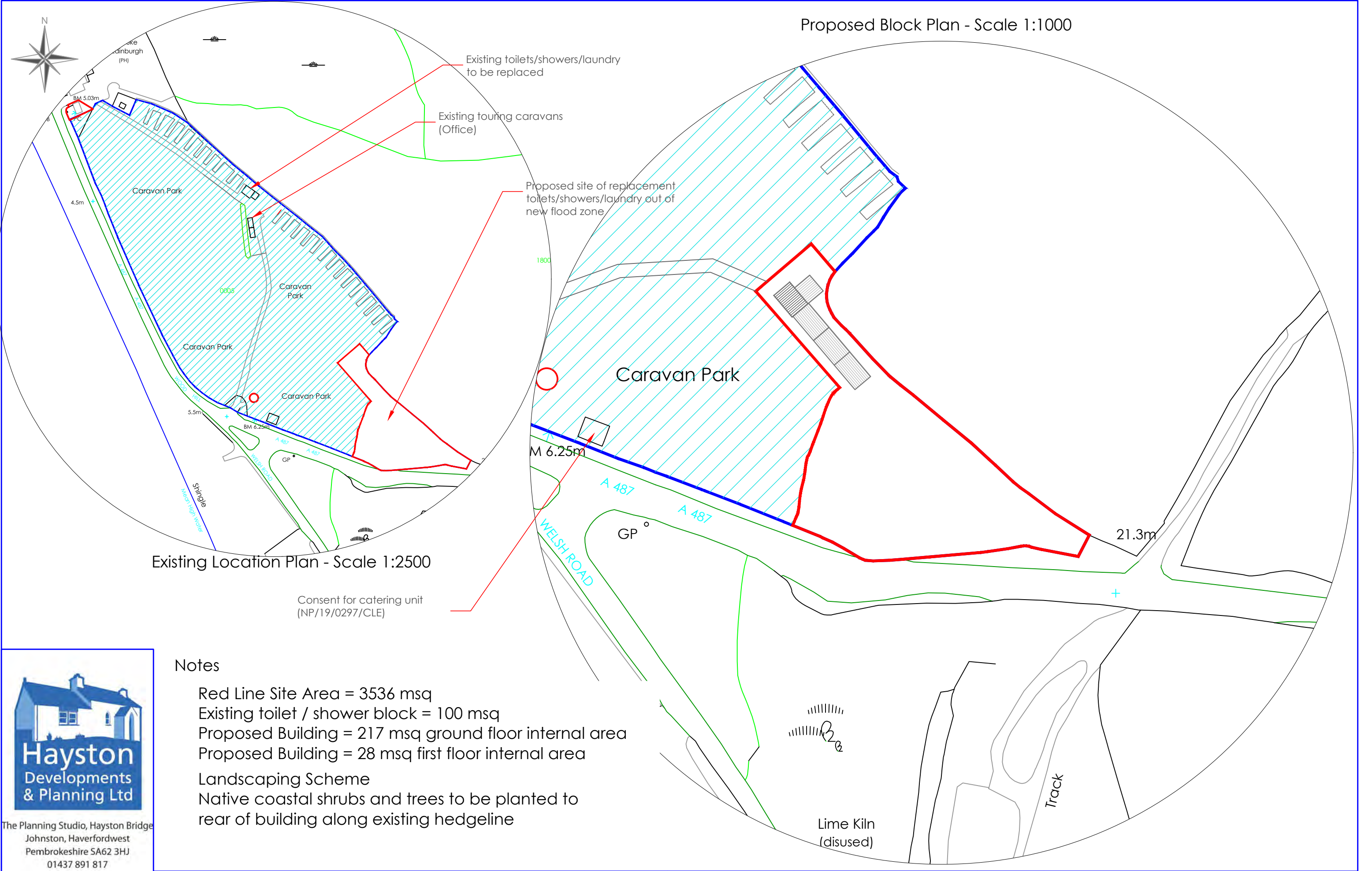
NorthWest



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|-----|-------------|------|---|---|----------------|
| | | | | Project number | AVH_847 |
| | | | | Date | 04.05.2022 |
| | | | | Client | Mr Mike Harris |
| | | | | Checked by | ' |
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19a





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Notes

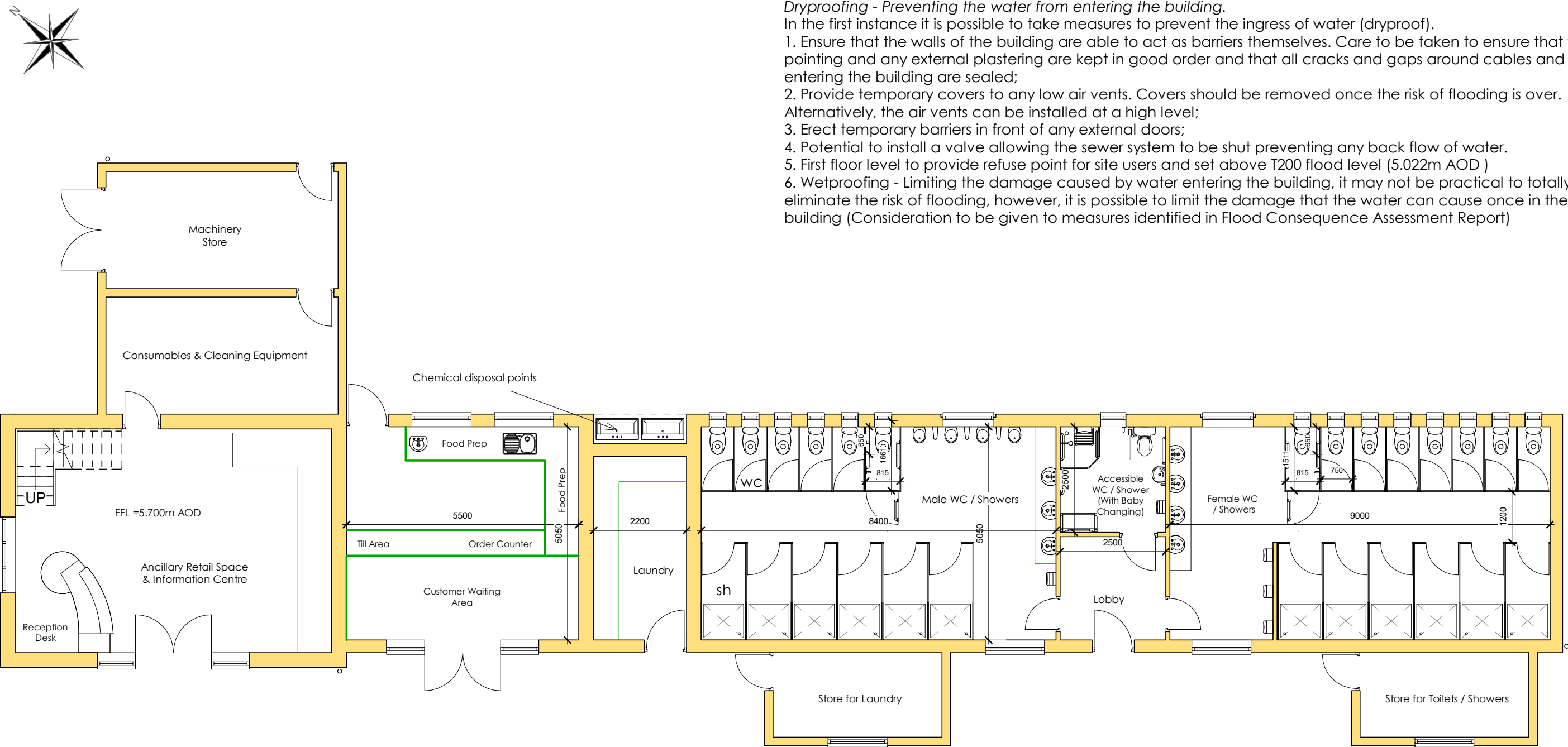
Red Line Site Area = 3536 msq
Existing toilet / shower block = 100 msq
Proposed Building = 217 msq ground floor internal area
Proposed Building = 28 msq first floor internal area
Landscaping Scheme
Native coastal shrubs and trees to be planted to rear of building along existing hedgeline

Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet. Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building. at Newgale Camp Site, Newgale, Pembrokeshire

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| Designed by | Checked by | File name AVH_847 | Date 05.09.2022 | Scale A3 - As Shown | Client Mr Mike Harris |
| Drawing Title Location & Block Plans | | | | | |
| Page 207 of 251 | | | | | 02b |

FLOOD PROOF MEASURES ON PROPOSED EXTENSION

Dryproofing - Preventing the water from entering the building.
In the first instance it is possible to take measures to prevent the ingress of water (dryproof).
1. Ensure that the walls of the building are able to act as barriers themselves. Care to be taken to ensure that the pointing and any external plastering are kept in good order and that all cracks and gaps around cables and ducts entering the building are sealed;
2. Provide temporary covers to any low air vents. Covers should be removed once the risk of flooding is over. Alternatively, the air vents can be installed at a high level;
3. Erect temporary barriers in front of any external doors;
4. Potential to install a valve allowing the sewer system to be shut preventing any back flow of water.
5. First floor level to provide refuse point for site users and set above T200 flood level (5.022m AOD)
6. Wetproofing - Limiting the damage caused by water entering the building, it may not be practical to totally eliminate the risk of flooding, however, it is possible to limit the damage that the water can cause once in the building (Consideration to be given to measures identified in Flood Consequence Assessment Report)





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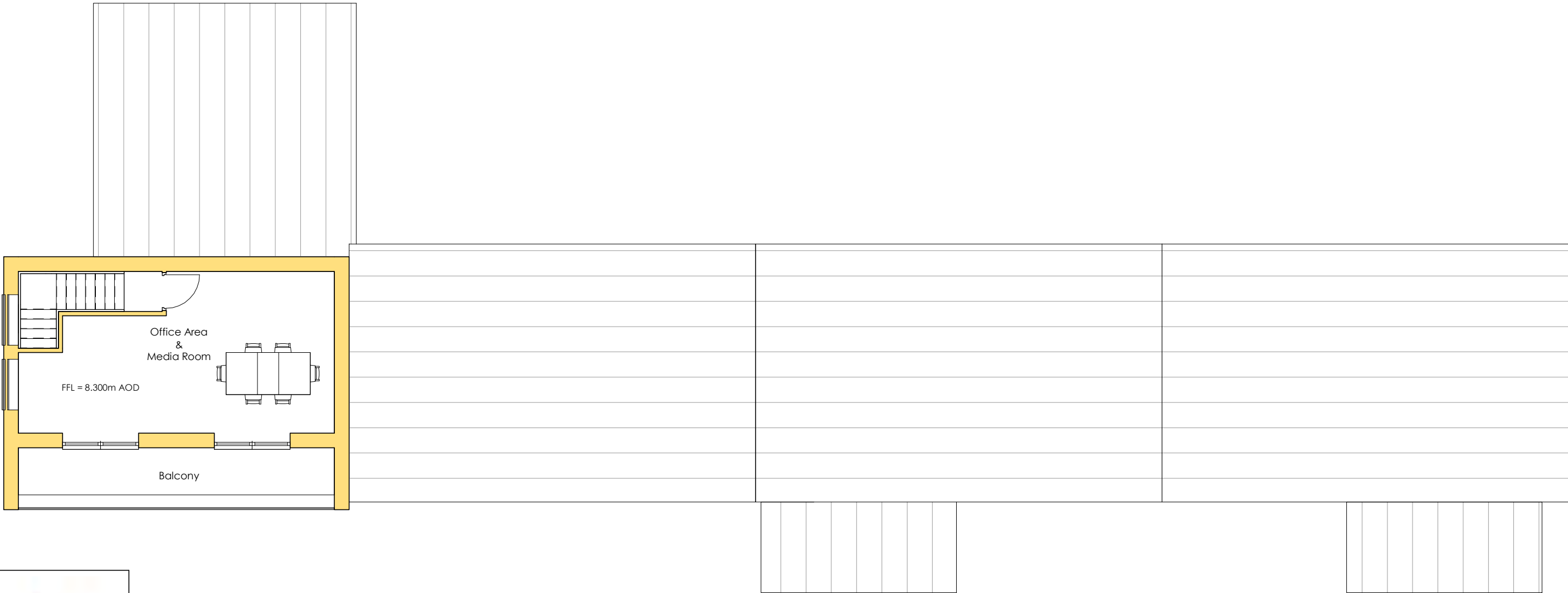
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|-----|-------------|------|---|----------------|---|---------|
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| | | | Project number | AVH_847 |  | |
| | | | Date | 04.05.2022 | | |
| | | | Client | Mr Mike Harris | | |
| | | | Checked by | | | |
| | | | | | Scale | 1 : 100 |



FLOOD PROOF MEASURES ON PROPOSED EXTENSION

Dryproofing - Preventing the water from entering the building.
In the first instance it is possible to take measures to prevent the ingress of water (dryproof).

1. Ensure that the walls of the building are able to act as barriers themselves. Care to be taken to ensure that the pointing and any external plastering are kept in good order and that all cracks and gaps around cables and ducts entering the building are sealed;
2. Provide temporary covers to any low air vents. Covers should be removed once the risk of flooding is over. Alternatively, the air vents can be installed at a high level;
3. Erect temporary barriers in front of any external doors;
4. Potential to install a valve allowing the sewer system to be shut preventing any back flow of water.
5. First floor level to provide refuse point for site users and set above T200 flood level (5.022m AOD)
6. Wetproofing - Limiting the damage caused by water entering the building, it may not be practical to totally eliminate the risk of flooding, however, it is possible to limit the damage that the water can cause once in the building (Consideration to be given to measures identified in Flood Consequence Assessment Report)



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|-----|-------------|------|---|--|--|--|--|
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09b



SouthWest



NorthWest

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| EXTERNAL FINISHES | | |
|-------------------|---------------|--|
| 1. | Roof Covering | Metal profiles roof (Insulated) - Grey in colour |
| 2. | Walls | Timber cladding - Cedar - Left to weather |

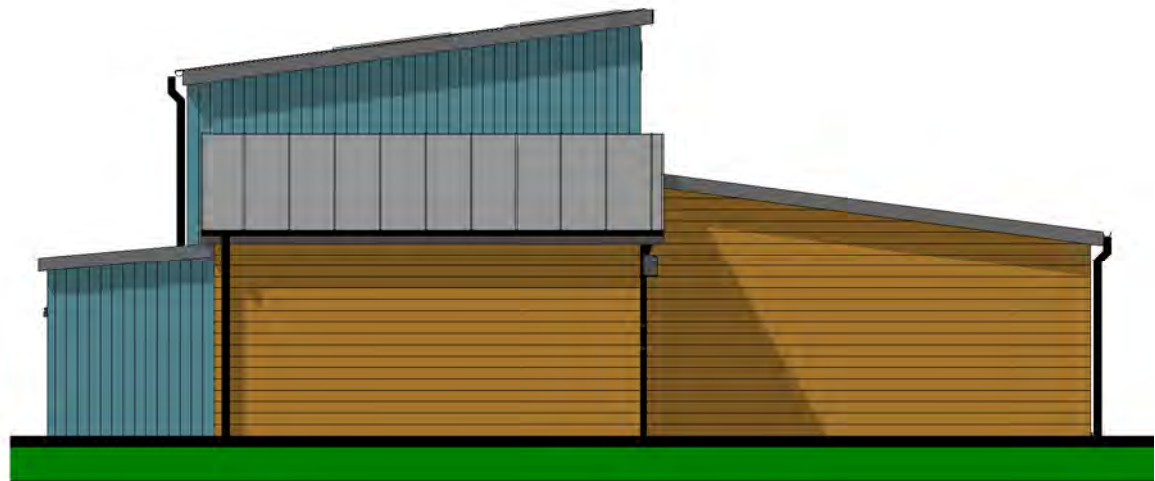
| | | |
|----|------------------|---|
| 3. | Rain Water Goods | Black uPVC Half Round Guttering with Circular Downpipes |
| 4. | Balustrades | Glass & aluminium |
| 5. | Windows | Grey uPVC |
| 6. | Doors | Grey uPVC |

| No. | Description | Date | <p>Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet.</p> <p>Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building.</p> <p>at Newgale Camp Site, Newgale, Pembrokeshire</p> | Proposed Elevations | |
|-----|-------------|------|--|---------------------|----------------|
| | | | | Project number | AVH_847 |
| | | | | Date | 04.05.2022 |
| | | | | Client | Mr Mike Harris |
| | | | | Checked by | ' |
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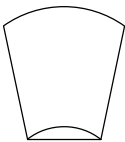
10b



NorthEast



SouthEast



Beumaris midi bat boxes



Bird box

| EXTERNAL FINISHES | | |
|-------------------|---------------|--|
| 1. | Roof Covering | Metal profiles roof (Insulated) - Grey in colour |
| 2. | Walls | Timber cladding - Cedar - Left to weather |


| | | |
|----|------------------|---|
| 3. | Rain Water Goods | Black uPVC Half Round Guttering with Circular Downpipes |
| 4. | Balustrades | Glass & aluminium |
| 5. | Windows | Grey uPVC |
| 6. | Doors | Grey uPVC |



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Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet.
Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building.
at Newgale Camp Site, Newgale, Pembrokeshire

| Proposed Elevations | | |
|---------------------|----------------|---|
| Project number | AVH_847 |  |
| Date | 04.05.2022 | |
| Client | Mr Mike Harris | |
| Checked by | ' | |
| Scale | | 1 : 100 |

Notes

Foul drainage to existing mains drainage system




Proposed planting of native coastal trees/shrubs

Proposed outside seating area
Seating area to be used for take-away
food purposes only

Outline of proposed single storey extension to relinquished public toilets

Seating Area



Existing footpath

Existing footpath

A close-up photograph of a red laser line projected onto a wall. The wall has a white label that reads "WALL HT500". The laser line is a bright red, slightly curved line that runs diagonally across the frame. The wall itself is a light-colored, textured surface.

Outline of existing public toilet block being relinquished by the local authority

$+ 3.92$

— Proposed outside seating area
Seating area to be used for take-away food purposes only

Roof water from proposed extension to new soakaway built to Building Regulation Standards and agreed on site with authority representative



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**Exchange Temporary Touring Caravan with Meet/Greet & Refuse Facility/Office
(With Additional Toilets/Showers) Attached to Existing Toilet/Shower Block,
Creation of 13 Grass Tent Plateaus & Security CCTV Pole / Flagpole on Entrance
and Conversion of Relinquished Toilet Block to Takeaway Cafe with Inclusive Toilet
for Public Use
at Newgale Camp Site, Newgale, Pembrokeshire**

Designed by

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| Checked by | |
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| File name | AVH_759 |
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Date
04.05.2022

Scale
A3 - 1:200

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| Client | Mr Mike Harris |
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Drawing Title

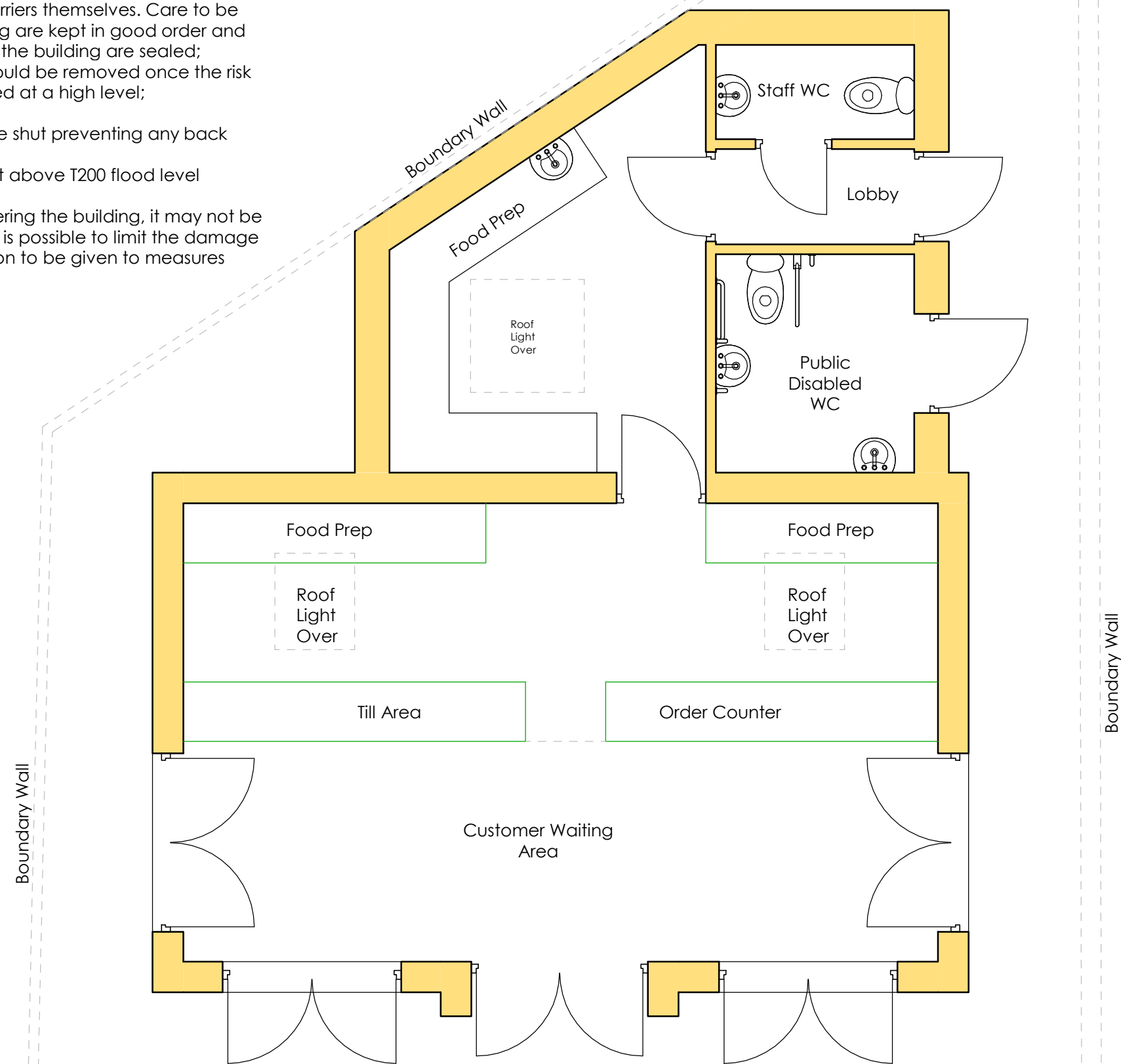
Site Plan Ice Cream Parlour

Page 212 of 251 Dwg No.

17b

FLOOD PROOF MEASURES ON EXISTING TOILET BLOCK


Dryproofing - Preventing the water from entering the building.
In the first instance it is possible to take measures to prevent the ingress of water (dryproof).
1. Ensure that the walls of the building are able to act as barriers themselves. Care to be taken to ensure that the pointing and any external plastering are kept in good order and that all cracks and gaps around cables and ducts entering the building are sealed;
2. Provide temporary covers to any low air vents. Covers should be removed once the risk of flooding is over. Alternatively, the air vents can be installed at a high level;
3. Erect temporary barriers in front of any external doors;
4. Potential to install a valve allowing the sewer system to be shut preventing any back flow of water.
5. First floor level to provide refuse point for site users and set above T200 flood level (5.022m AOD)
6. Wetproofing - Limiting the damage caused by water entering the building, it may not be practical to totally eliminate the risk of flooding, however, it is possible to limit the damage that the water can cause once in the building (Consideration to be given to measures identified in Flood Consequence Assessment Report)

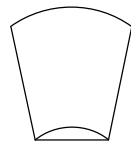


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Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet.
Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building.
at Newgale Camp Site, Newgale, Pembrokeshire

| Proposed Floor Plan - Relinquished Toilet Block | | | |
|---|----------------|---|--|
| Project number | AVH_847 |  | |
| Date | 04.05.2022 | | |
| Client | Mr Mike Harris | | |
| Checked by | ' | | |
| Scale | | 1 : 50 | |



Beumaris midi bat boxes



Bird box



SouthWest



SouthEast



NorthEast



NorthWest

EXTERNAL FINISHES

| | | |
|----|--------------------|--|
| 1. | Proposed Roof | Metal profiles roof (Insulated) - Grey in colour |
| | Existing Roof | Existing blue/grey slate to remain |
| 2. | Walls to Extension | Timber cladding - Cedar - Left to weather |

Existing Walls Existinmg Roughcast - Left to weather

| | | |
|----|------------------|---|
| 3. | Rain Water Goods | White uPVC Half Round Guttering with Circular Downpipes |
| 4. | Windows | Grey uPVC |
| 5. | Doors | Grey uPVC |



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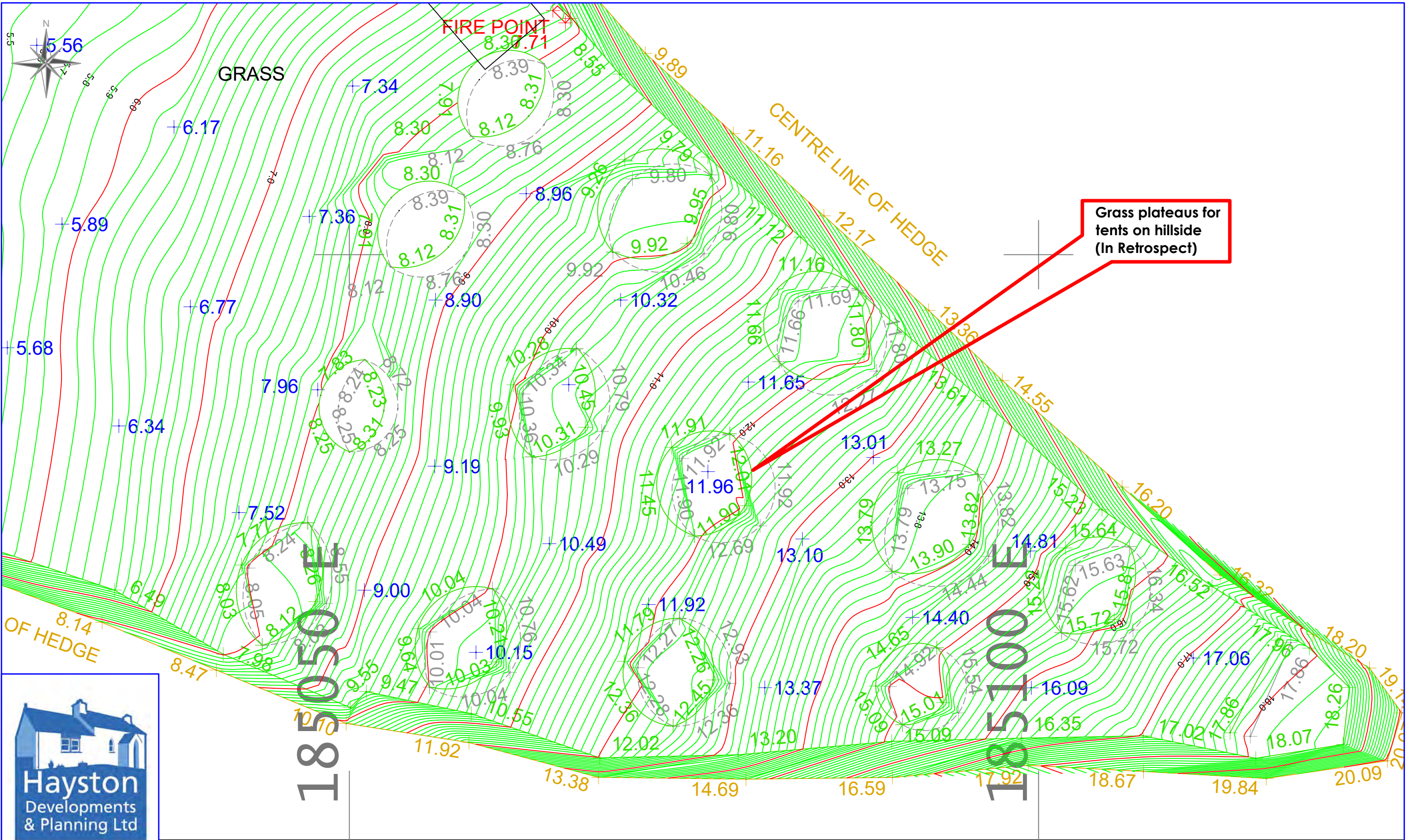
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at Newgale Camp Site, Newgale, Pembrokeshire

Proposed Elevations - Relinquished Toilet Block

| | |
|----------------|----------------|
| Project number | AVH_847 |
| Date | 04.05.2022 |
| Client | Mr Mike Harris |
| Checked by | ' |

Scale 1 : 100

21b



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Demolition of Existing Toilets/Showers/Store/Laundry (Removal of Touring Caravan for Reception) to an Alternative Site Outside of the Flood Zone with Expansion with Replacement Toilets/Showers/Store/Laundry Room, Reception/Office & Media Room. Creation of 12 Grass Tent Plateau's & Security CCTV Flagpole Plus Conversion of Relinquished Public Toilet Block to Takeaway Cafe / Ice Cream Parlour with Small Extension to Create a Replacement Public Toilet. Relinquish Mobile Catering Unit (NP/19/0297/CLE) with Catering Facility Incorporated into New Building. at Newgale Camp Site, Newgale, Pembrokeshire

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|---|------------|----------------------|--------------------|---------------------|--------------------------|
| Designed by | Checked by | File name AVH_847 | Date 04.05.2022 | Scale A3 - 1:250 | Client Mr Mike Harris |
| Drawing Title Plan Showing Grass Plateau Areas (In Retrospect) | | | | | |
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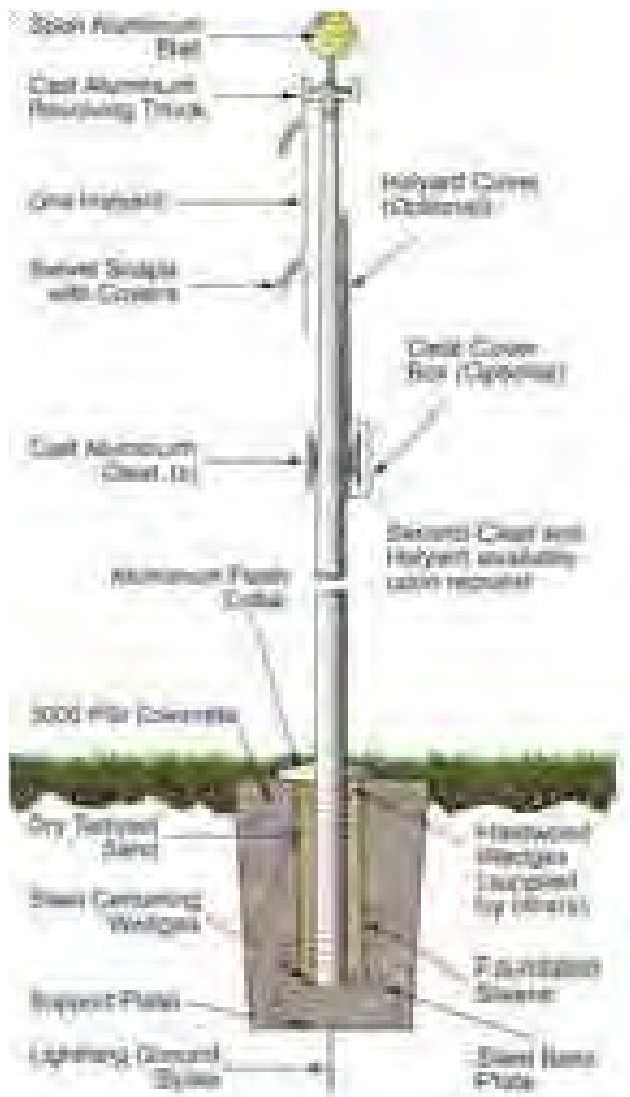
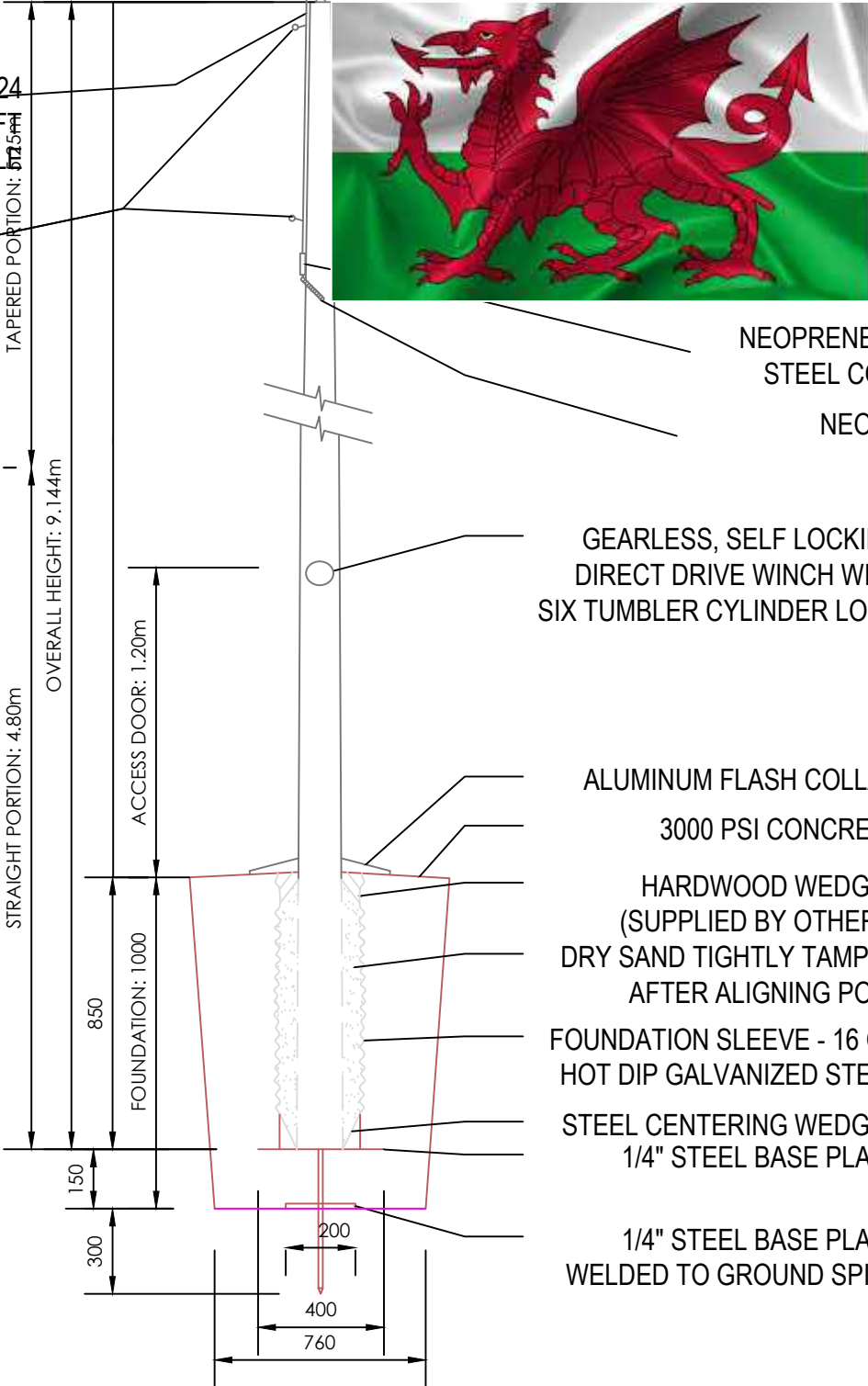
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|---|------------|----------------------|--------------------|----------------------|--------------------------|
| Designed by | Checked by | File name AVH_847 | Date 04.05.2022 | Scale A3 - 1:2500 | Client Mr Mike Harris |
| Drawing Title Photo Montage - Grass Plateaus (In Retrospect) | | | | | |
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SINGLE SHEAVE TRUCK, CAST ALUMINUM REVOLVING, NON-FOULING, INTERNAL HALLYARD TRUCK

1/8" x 7 x 19MIL-C-5424 STAINLESS STEEL AIRCRAFT CABLE

STANDARD FLAG ARRANGEMENT: 5' x 8'



- NOTES:
1. INSTALLATION TO BE COMPLETED IN ACCORDANCE WITH MANUFACTURER'S SPECIFICATIONS.
 2. DO NOT SCALE DRAWING.
 3. THIS DRAWING IS INTENDED FOR USE BY ARCHITECTS, ENGINEERS, CONTRACTORS, CONSULTANTS AND DESIGN PROFESSIONALS FOR PLANNING PURPOSES ONLY. THIS DRAWING MAY NOT BE USED FOR CONSTRUCTION.
 4. ALL INFORMATION CONTAINED HEREIN WAS CURRENT AT THE TIME OF DEVELOPMENT BUT MUST BE REVIEWED AND APPROVED BY THE PRODUCT MANUFACTURER TO BE CONSIDERED ACCURATE.



Flagpole Base (Installed)



Existing Flagpoles Erected

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| | Drawing Title Nautical Flagpole to Support CCTV Camera | Page 217 of 251 | Dwg No. 15a | |