



NP/23/0534/FUL

Newgale Campsite, Newgale,  
Haverfordwest, Pembrokeshire, SA62  
6AS

Graddfa/Scale: 1:1,250





## PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT

<b>Application Ref</b>	NP/23/0534/FUL
<b>Case Officer</b>	Kate Attrill
<b>Applicant</b>	Mr Harris
<b>Agent</b>	Hayston Development and Planning Ltd
<b>Proposal</b>	Demolition of existing toilets/showers/store/laundry & removal of touring caravans for reception & office/meeting room to the nearest alternative site outside the flood zone, with modest expansion for the replacement toilets/showers/store/laundry/reception & office/meeting room; plus integrated modest takeaway food kiosk to replace surrendered certificate of lawfulness via 106 Agreement for mobile catering unit
<b>Site Location</b>	Newgale Campsite, Newgale, Haverfordwest, Pembrokeshire, SA62 6AS

**This application is being considered by the Development Management Committee as the Director with responsibility for Planning considers that it raises matters of public and/or Member interest.**

### Summary

The proposal is for the demolition of an existing toilet and shower building located within the Newgale Campsite. A new building is proposed to be located at a higher point within the site, in a location with less flood risk which is outside the coastal change area. The proposed building is significantly larger than the existing building with regards to floorspace. The applicant has suggested the building will replace existing reception caravans on site – however in planning terms these are currently unauthorised. The applicant has also suggested he will rescind use of a mobile catering unit, however the mobile unit is in any case only permitted for part of the year on a temporary basis and in any event no legal agreement has been provided to ensure this.

It is considered that the increased scale of the building, together with the prominent visual location would result in an unacceptable landscape impact. Insufficient information on lighting has been provided and the landscaping proposed would not be capable of mitigating the impact created by a building of the scale proposed. Insufficient information in support of the retail element of the takeaway use has been provided to justify it. The proposal is not considered to meet the requirements of the PCNPA LDP in terms of policies and guidance relating to coastal change relocation, special qualities, design, landscape and retail and is therefore recommended for refusal.

The application plans and full details can be found on the PCNPA website at: [PCNPA Planning \(pembrokeshirecoast.wales\)](http://PCNPA Planning (pembrokeshirecoast.wales))

### **Consultee Response**

<b>NRW</b>	Concern
<b>PCNPA Tree and Landscape</b>	Conditional consent
<b>PCC Public Protection</b>	Informative
<b>PCC Highways</b>	No objection
<b>Fire and Rescue Service</b>	No objection
<b>Coal Authority</b>	No objection
<b>PCC Access officer</b>	Informative
<b>PCC Pollution control</b>	No objection
<b>Dwr Cymru/Welsh Water</b>	Conditional consent
<b>PCC Drainage Engineers</b>	Informative
<b>Nolton and Roch Community Council</b>	Object

### **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.

Three third party responses have been received comprising of two letters of objection, issues raised include: potential negative impacts on other businesses in the area, a breach of the terms and conditions (covenants) of land purchase legal agreements entered into by the applicant upon purchase of the campsite, health and safety concerns, pollution concerns, highway safety concerns, floodrisk, climate change and a negative impact on other local employment opportunities. A further letter relating to information on legal covenants applying to the campsite has also been submitted to the Authority. One letter of support has been received.

Nolton and Roch Community Council have objected to the proposed development stating that Members have in-principle objections regarding the size, scale and design of the proposed building and the visual impact on the sensitive landscape at Newgale beachfront. Members feel the transient nature of current food and ancillary provisions at the campsite whilst not ideal do have less impact on the sensitive landscape than the proposed building put forward in this application.

The material planning issues raised are addressed within the main body of this report. The matter of breach of private covenants is not material.

## **Policies considered**

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

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

Policy 1 National Park Purposes and Duty (Strategy Policy)  
Policy 7 Countryside (TIER 4) (Strategy Policy)  
Policy 8 Special Qualities (Strategy Policy)  
Policy 9 Light Pollution  
Policy 10 Sites and Species of European Importance  
Policy 14 Conservation of the Pembrokeshire Coast National Park  
Policy 29 Sustainable Design (Strategy Policy)  
Policy 30 Amenity  
Policy 31 Minimising Waste  
Policy 32 Surface Water Drainage  
Policy 34 Flooding and Coastal Inundation  
Policy 35 Development in the Coastal Change Management Plan  
Policy 38 Visitor Economy (Strategy Policy)  
Policy 41 Caravan, Camping and Chalet Development  
Policy 42 Site Facilities on Tent, Chalet and Caravan Sites  
Policy 55 Infrastructure Requirements  
Policy 57 Town and District Shopping Centres  
Policy 59 Sustainable Transport (Strategy Policy)  
Policy 60 Impacts of Traffic  
Planning Policy Wales Edition 12  
SPG Landscape  
SPG Seascape  
SPG Planning Obligations  
SPG Caravan Camping and Chalet  
SPG Sustainable Design and Development  
SPG Biodiversity  
TAN 12 - Design  
TAN 24 - The Historic Environment

Future Wales 2040

## **Constraints**

NPA Property – within 25 m  
Special Area of Conservation – within 500m  
Biodiversity Issue  
Safeguarding Zone  
Ancient Monument – within 500m  
Hazardous Zones  
Potential for surface water flooding  
Recreation Character Areas  
Surface Coal / High Coal Risk  
Affordable Housing Submarkets  
Seascape Character Areas / Landscape Character Areas

## **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 position 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.

The campsite is located outside the LDP 2 Rural Centre boundary for Newgale.

The Newgale campsite covers a large area of land along the seafront, extending to some 8.77 acres in total, currently in the same ownership as the toilet block adjacent, subject of the previous report. The campsite primarily consists of closely mown grass with informal pitches and is level to the north and west, rising up to a bank to the south-east of Wood Hill with some tent plateaus, which are currently unauthorised. Centrally located on the north-eastern perimeter of the site is an established flat roofed toilet/shower block.

There are also currently two temporary caravans which are used as a site office/reception and for security purposes, together with a trailer for general storage, but these do not at present, benefit from any permission and are unauthorised.

### **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 28 March 2000

**NP/07/450** Toilet block Extension – approved 08 October 2007

**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 23<sup>rd</sup> August 2019

**NP/23/0124/FUL** - Change of use of surplus public toilets to takeaway ice cream parlour/coffee bar & beach themed retail with small rear extension to create kitchen together with new public disabled toilet as required by Pembrokeshire County Council - refused 6<sup>th</sup> September 2023

## Description of Proposal

This application proposes the demolition of the existing toilet/shower/store/laundry building on the camp site. It also proposes the removal of unauthorised touring caravans for reception & office/meeting room. The applicant is also proposing to surrender a mobile catering unit authorised under a certificate of lawfulness for part of the year on a temporary basis via a legal agreement. The proposal is to replace these elements with a new building which will provide toilets/showers/store/laundry/reception & office/meeting room; plus integrated takeaway food kiosk. The agent for the application has described the site location as the nearest alternative site outside the flood zone.

The proposed new building would have a gross internal area of 237m<sup>2</sup>. It is a single storey proposal with variations in roof line height and materials used to differentiate elements of the building such as the entrance to the camp site office and takeaway element from the shower and toilet block. External finishes proposed include natural or composite slate for some of the roof line with other roofing in metal profile. Wall finishes proposed are a mixture of sand/cement render painted, timber cladding - cedar left to weather and seamed zinc black in colour. Grey uPVC windows and doors are proposed with black uPVC rainwater goods.

Beaumaris midi bat boxes and a bird box are shown on the plan elevations.

A landscaping scheme is proposed on the rear existing hedge, with a new Pembrokeshire hedgebank proposed to the southeast.

A proposed access track to the facility in permeable crushed stone is also included as part of the scheme, leading to a footpath which extends around the building in permeable crushed stone or porous paving.

## Key Issues

The application raises the following planning matters:

- Policy and Principle of Development (*existing use, flood risk, coastal change, retail impact*)
- Siting, Design and Impact upon the Special Qualities of the National Park
- Access and parking
- Drainage
- Landscaping and Biodiversity
- Other material considerations: Coal Risk

### ***Policy and principle of development***

Future Wales – The National Plan 2040 (FW) which was adopted on 24<sup>th</sup> 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.

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. The Centre boundary of Newgale is located a short distance away to the north - the boundary includes the residential and commercial properties which rise up Newgale Hill. Policy 7 of the Plan (Countryside) sets out the types of development that are acceptable, in principle. This includes tourist attractions where the need to locate in the countryside is essential, extensions to established businesses and assisting coastal communities in preparing for and adapting to coastal change.

As an existing campsite and business therefore in principle an extension is acceptable, subject to other detailed policy considerations including assessment of the justification for additional site facilities and retail impact. In this specific circumstance however, the location of the business is within an area defined by LDP 2 as being subject to coastal change area where significant physical change is anticipated in the future. The acceptability in principle of the proposals therefore also depend on compliance with policies relating to flood risk, coastal change and retail impact.

### ***Existing use***

The existing toilet/shower block on site has planning permissions dating from 2000 and 2007. The existing floor space of the toilet and shower block is just over 117 sq metres.

There are 3 existing meet and greet caravans on site which together form a total of 78 sq metres in size. These are however currently unauthorised and do not benefit from planning permission.

There is a certificate of lawful use on site for a single mobile catering unit however this is confined by specific terms including hours of use 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. This is not a physical or permanent building.

In proposing a building of 237m<sup>2</sup> therefore the applicant is increasing significantly the level of floorspace permitted as a physical and permanent building on site, from the existing permitted 117 sq metres. The existing permitted element on site is a material consideration, but very limited weight should be given to the other elements on site when considering this proposal.

### ***Flood risk***

The existing toilet and shower block lies immediately outside the Flood Zone C2 in the Development Advice Map as defined by Natural Resources Wales (NRW) but within the NRW flood map zone 3 area.

The proposed site lies within Zone A within the Development Advice Map. It is very partially within the Flood Zone 2/3 Sea of the NRW Flood Map for Planning.

The application states that the site chosen is the closest available outside the flood zone area. NRW have commented that given the limited extent of flood risk shown to be affecting the application site they consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.

The proposed location is therefore acceptable in terms of flood risk based on its siting alone and meets the requirements of national and local policy in this regard. However, there is no obvious road or escape route for any persons using the building in the event of a significant flood event - this issue is discussed in greater detail below in terms of highways access and safety.

### ***Coastal change***

Paragraph 6.5.16 of Planning Policy Wales requires planning authorities to use shoreline management plans to identify stretches of coast where coastal defences will no longer be maintained and to include specific policies to manage development in such areas.

The National Park LDP 2 identifies Coastal Change Management Areas to address the risk areas identified by the Shoreline Management Plans. The application site is outside but immediately adjacent to a Coastal Change Management Area defined in LDP2.

The LDP2 has a specific policy (Policy 37 Relocation and replacement of development (other than residential) affected by coastal change) which supports the relocation and replacement of development affected by coastal change in specific circumstances. Policy 37 supports the relocation and replacement of commercial and businesses affected by coastal change provided that it meets a range of criteria, including:



- 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;
- b) the new development is outside and inland of the coastal change management area and where possible close to the coastal community from which it was displaced;
- c) the new building is comparable in size to that which it is to replace.

The West of Wales Shoreline Management Plan in relation to the part of Newgale within the Coastal Change area 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). As set out in the PCC Flooding and Land Drainage officer consultation response, a report commissioned by Pembrokeshire County Council concluded that the shingle bank will become increasingly unstable and vulnerable to failure, with a likelihood that by 2030 the current situation may become unsustainable.

Until the situation becomes unviable due to engineering and or cost constraints, Pembrokeshire County Council will clear the highway of shingle and reinstate the crown of the shingle defences, however their response points out that increased incidents of failure of the sea defence and flood events will affect the highway, application site and surrounding areas. The information above in relation to the existing building within the Coastal Change area therefore demonstrates that the development to be replaced is forecast to be affected by erosion within 20 years of the date of the proposal. The proposal therefore complies with criterion a of Policy 37.

With regards to the proposed siting of the new building - it is outside and inland of the coastal change management area. It is not located close to Newgale centre boundary but is within the existing business it is seeking to support. It is therefore considered to broadly accord with criterion b of Policy 37.

With regard to criterion c of Policy 37, as set out above the existing authorised permanent buildings on site amount to 117 sq metres in scale. The proposed building is 237 sq metres in terms of its gross internal area. This is a significant increase in scale and even when the potential certificate for the mobile unit is considered, the level of increase is considered significant. The proposal therefore does not comply with criterion c of Policy 37.

### ***Site Facilities on Camping Sites and Retail Impact***

Policy 42 of the LDP2 sets out the criteria to be considered where development of retail and other facilities is proposed on camping, chalet and caravan sites. These criteria include a requirement that the facility is not already available in the vicinity, consideration of scale and design and clarification that the vitality and viability of retailing and services of nearby Centres are not adversely affected.

The proposal includes the use of part of the building for A3 use class (takeaway). Policy 57 supports changes of use, redevelopment or development of new buildings within specific locations. It supports A1, A2 and A3 uses or community facilities where they are located within a Rural Centre. This reflects national planning policy and the principle of town centre first locations for A class use proposals.

Planning Policy Wales Edition 12 recognises that shops ancillary to other uses can serve a useful role in rural areas (pointing to examples such as farm shops), it advises Planning Authorities to take account of the following in considering such proposals (paragraph 4.3.42):

- The potential impact on nearby retail and commercial centres or village shops;
- The desirability of providing a service throughout the year and
- The likely impact of traffic generated and access and parking arrangements

The proposal as suggested would serve the general public and not simply those visiting the campsite. Detailed consideration of parking and highways matters is set out below. Concerns have also been raised by third parties regarding the potential commercial impact on other nearby businesses. Whilst planning policy does not seek to prevent competition between businesses, it does seek to ensure that businesses within town centres or locations identified in a retail hierarchy are protected from negative impacts. In this case - the current proposal is for a gross internal floorspace of approximately 237 square metres. The campsite benefits from a CLEUD which allows for some A3 element on site already. No information on the potential impact on nearby centres has been provided.

The application mentions the potential for the applicant to relinquish their existing CLEUD for a mobile food unit, however no legal agreement to provide clarity on the mechanism for this has yet been provided. It should also be noted that the existing CLEUD does not allow for operation all year around on site. Without a signed legal agreement, the Authority cannot have certainty that there would not be an increase beyond the existing CLEUD in terms of the retail floorspace provided.

Objectors have raised issues regarding a legal covenant entered into by the applicant when the campsite was purchased, which they consider may limit their ability to operate an A3 use. This is a civil matter and not a material consideration for the LPA to consider as part of the planning application process.

It is recognised that the proposed retail use is likely to support the campsite (an existing rural business) financially, however it is in a location outside the Rural Centre of Newgale. The location would also serve wider visitors to Newgale, only some of whom may be staying on the campsite. The proposed location of the development is outside the Rural Centre of Newgale and therefore contrary to the provisions of Policy 57.

Without a signed legal agreement the Authority cannot be certain that the mobile food unit would be relinquished. The Authority is therefore not in a position to conclude based on the information before it that the retail impacts of the proposal would be acceptable and would not adversely affect nearby Centres and therefore the proposal is not considered to comply with retail policies of the LDP2.

### ***Policy principle conclusion***

National and Local planning policies are supportive in principle of rural business and their expansion when a countryside location is essential. In this case however the existing business is situated within a Coastal Change Management Area where specific additional policies apply. These policies must be considered when assessing proposals because of the significant change anticipated over time in these locations. In this case, whilst the location for the new building is considered acceptable in flood risk terms, the significant increase in floorspace proposed is considered unacceptable and to be contrary to the provisions of Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change) of LDP2. In addition, insufficient information to justify the takeaway element of the proposal has been supplied and the Authority therefore considers the proposal contrary to Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites) and Policy 57 (Town and District Shopping Centres) of PCNPAs adopted LDP2.

There is therefore an in-principle objection to this proposal.

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

Planning Policy Wales (Edition 12), 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 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'.

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)).

Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky.

Policy 9 seeks to conserve that character and limit the impact of lighting which could negatively impact on the special qualities of the National Park.

The proposed site location is within an area identified as Landscape Character Area 12 St Bride's Bay within the adopted Landscape SPG for PCNPA. The Special Qualities and key landscape characteristics are identified as including a landscape with a strong visual relationship to the coast. It is noted that there is a high degree of exposure, especially along the higher ground and along the wide expanse of cobble beach that is Newgale Sands. The management guidance for the LCA include a recommendation that tourism developments should be sited and designed to avoid adverse landscape and visual impacts.

As set out above - the proposed building is significantly larger in scale than the existing with a Gross Internal Area of 237m<sup>2</sup>, roughly double the GIA of the existing building on site.

The main elevation of the proposed building would be approximately 37 metres long, roughly double the length of the existing building. This is significantly longer than other elevations within Newgale - for example The Duke of Edinburgh Inn at approximately 22metres. It is proposed to cut the ground level of the building into the slope of the site, however limited information on how this cut slope would be treated has been provided. No information has been provided to show how the change in level between the red line boundary which runs perpendicular to the proposed hedgebank and the new ground level of the site would be implemented.

The introduction of a crushed stone access track and footpath around the building would change the current green field nature of this part of the site.

NRW have raised concerns regarding the potential landscape impact created by the proposed building. They state: "*The proposed building would be located away from the existing toilet block and further away from the settlement cluster which begins around the Brandy Brook. In this location the building would be set within an open and exposed context, both visually and*

*physically, and would not relate, physically or visually, to any other existing permanent built elements.*

*The proposed building would formalise the character of a campsite which currently has a distinctly informal character. There is likely to be merit in consolidating elements into single building. But the scale and location of the proposed building means it would be widely visible as a new permanent feature within the coastal landscape. Planting schemes cannot be relied upon to provide visual integration in this location."*

NRW go on to note that it will be very difficult to establish and maintain any vegetation on slopes at this gradient, particularly in the context of the site's exposed location. They raise concern that the proposed tree planting is inappropriate in this location and that the exposure of this site would restrict larger trees from establishing, particularly those planted as single specimens. The proposed hedgebank is not considered to relate to other landscape features.

Whilst the single storey proposal is an improvement on the previously submitted schemes and the mix of materials and varying ridge height is an appropriate approach to breaking up the bulk of a single storey building, the overall scale of the proposed building is considered unacceptable and likely to have significant adverse landscape impacts. Limited information on lighting has been provided and the Authority also has insufficient certainty therefore that dark skies and night-time tranquility would be conserved. No specific appraisal of landscape impacts has been provided and there is insufficient information to demonstrate that the design and treatment of the external spaces and landscape setting is appropriate.

The current proposals fail to demonstrate that it would integrate successfully into the sensitive landscape context at Newgale or that it would conserve and enhance the character and natural beauty of the PCNP. The proposal is considered contrary to the management recommendations of the PCNPA Adopted Landscape Character Areas SPG and contrary to Policy 8 (Special Qualities), 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) and 29 (Sustainable Design) of the adopted PCNPA LDP2.

### ***Amenity and Privacy***

Policy 30 of LDP2 refers to 'amenity' in general with criteria (a) and (b) seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties.

The potential position of a takeaway element within the building situated at a higher point within the existing campsite but open to the wider public is likely to draw some additional visitors to visit within the campsite during its open hours. There is therefore the potential for additional noise and disturbance to impact on those staying within the campsite, however some level of noise is to be anticipated when staying within a camping area and this is considered likely to be within the level of normally anticipated disturbance.

No wider amenity impacts on other separate properties are anticipated from the proposal. As such the proposed development is considered to comply with Policy 30 of the LDP2.

### ***Access and Parking***

Policy 59 (Sustainable Transport) seeks to permit development which promotes sustainable travel choices and reduces the need to travel by car by ensuring new development is well designed and provides appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate and not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated.

Policy 60 (Impacts of Traffic) prevents development where appropriate access cannot be achieved; where traffic would generate an unacceptable adverse effect in terms of congestion, times of generation or where there is an unacceptable adverse effect on road safety.

The site is accessed from the main A487 road which runs between Haverfordwest and St. David's.

The main campsite is accessed by an entrance point from the A487 at the bottom of Wood Hill and those staying in the campsite typically park their cars adjacent to their tents.

The Highways Authority have been consulted. They have raised no objection to the development.

As the proposal is for a limited retail use in association with an existing business and there is an expectation that the main users will be those visiting the campsite, the lack of specific parking spaces for the proposal is considered acceptable, provided appropriate conditions ensure the building cannot operated separately to the campsite are in place.

As set out within the Coastal Change analysis of the Policy and Principle of Development section - there is a lack of clarity around the potential access arrangements that will be available to the building and this area of Newgale post 2030. Give this uncertainty regarding the long-term accessibility of the site - if minded to grant approval (contrary to the recommendations in this report), the Authority would need to consider whether a permanent permission was appropriate.

However, the application is for a permanent facility and there is no certainty on how longer-term access to the wider site would be achieved. The proposal is therefore contrary to Policy 59 Sustainable Transport and Policy 60 Impacts of Traffic.

## ***Landscaping & Biodiversity***

To comply with Planning Policy Wales (2024) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

The proposal is supported by a Green Infrastructure Statement and biodiversity enhancements are shown on the plans including bat and bird boxes and some small areas of native planting. Information to ensure the delivery of the planting to be provided can be controlled via condition.

As set out above, NRW have raised concerns regarding the nature of the landscaping proposed in this location and the lack of information on a lighting strategy.

The application is considered acceptable in relation to biodiversity considerations but is not considered to be acceptable in relation to landscaping.

## ***Drainage***

PCC Drainage Officers have advised that SAB approval would be required. The plans submitted show information regarding soakaways. however, the level of cutting into the bank and potential for run off in construction is potentially significant. Information regarding how this would be managed has not been provided but could be conditioned through a Construction Management Plan.

The application indicates that foul flows are to be disposed of via the public sewerage system, with surface water proposed to be drained to a soakaway. Dwr Cymru have not objected to the proposal but recommend a condition to ensure that surface water does not enter the public sewerage network. PCC have raised no adverse comments in relation to drainage matters.

Subject to potential applications of condition, the application is considered acceptable in relation to drainage, however this does not outweigh the other material considerations and policy conflict identified above.

## ***Other Material Considerations: Coal Risk***

The application site falls within a defined Development High Risk Area for Coal.

The application is supported by a Coal Mining Risk Assessment prepared by Rhondda Geotechnical Services Ltd. The Coal Authority has reviewed the Risk Assessment and concluded that the application site is safe and stable for the proposed development.

## ***Well-being***

This report takes account of the duty placed on Pembrokeshire Coast National Park Authority as a public body, by the Well-Being of Future Generations Act 2015 to carry out sustainable development. The duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 has been considered. This report is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out in the Act.

## **Conclusion**

The proposed caravan site as submitted fails to accord with Local and National Planning policy in the following respects:

1. The building proposed is of a scale significantly larger than the building it seeks to replace, this together with a formalised access track and footpath positioned in a prominent and high landscape location would result in a visual intrusion into the sensitive landscape of the National Park. Insufficient information on lighting strategy has been provided and the landscaping proposed is not appropriate for this location. The proposal is therefore contrary to the provisions of PCNPA LDP2 Policy 8 (Special Qualities), Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change and the Authority's Supplementary Planning Guidance Document on Landscape Character.
2. The retail element of the proposal has not been sufficiently justified and is therefore not compliant with PCNPA LDP 2 Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites) and Policy 57 (Town and District Shopping Centres).
3. The majority of the campsite which is the subject of this application is located within a Coastal Change area. The Authority has insufficient information on how the site will be accessed when the road is no longer maintained. The Authority therefore has no certainty that in the long term appropriate access can be achieved. The proposal is therefore contrary to Policy 59 Sustainable Transport and Policy 60 (Impacts of Traffic).

Issues regarding coal and biodiversity matters are dealt with acceptably and matters of drainage could be addressed via planning condition. These do not however outweigh the issues of concern above.

## **Recommendation**

Refuse for the following reasons:



The proposed caravan site as submitted fails to accord with Local and National Planning policy in the following respects:

1. The building proposed is of a scale significantly larger than the building it seeks to replace, this together with a formalised access track and footpath positioned in a prominent and high landscape location would result in a visual intrusion into the sensitive landscape of the National Park. Insufficient information on lighting strategy has been provided and the landscaping proposed is not appropriate for this location. The proposal is therefore contrary to the provisions of PCNPA LDP2 Policy 8 (Special Qualities), Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change and the Authority's Supplementary Planning Guidance Document on Landscape Character and the principles of TAN12 (Design).
2. The retail element of the proposal has not been sufficiently justified and is therefore not compliant with PCNPA LDP 2 Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites) and Policy 57 (Town and District Shopping Centres).
3. The majority of the campsite which is the subject of this application is located within a Coastal Change area. The Authority has insufficient information on how the site will be accessed when the road is no longer maintained. The Authority therefore has no certainty that in the long-term appropriate access can be achieved. The proposal is therefore contrary to Policy 59 Sustainable Transport and Policy 60 (Impacts of Traffic).