

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



Ref No: NP/24/0567/FUL
Proposal: Demolition of existing toilets/showers/store/laundry building (removal of touring caravans for reception) to an alternative site outside flood zone, with expansion with replacement toilets/showers/store/laundry/reception office building with ecological and landscape enhancements (revision of refused application NP/23/0534/FUL)
Site Location: Newgale Coast Holiday Park, Newgale Camping site

Recommendation: Refuse

This application is being presented to Committee Members at the request of the Development Management Manager/Director with responsibility for Planning as the application raises matters of public interest.

Summary

This application seeks consent for a replacement facilities block on a site adjacent to the floodplain at Newgale campsite.

This application follows the refusal of a previous scheme on the same site in 2024.

Due to the potential for intensification of a use within the flood plain, the replacement building being considered to be unsympathetic to the local landscape, and the subsequent visual impacts on the special qualities of the National Park, the recommendation is to refuse planning permission.

The full details of the application and consultation responses can be viewed on-line here: [Citizen Portal Planning - application details](#)

Consultee Response:

- **Natural Resources Wales:** Further information required – Concerns regarding impacts on landscape
- **Community Council:** Objecting
- **Public Protection:** No objection / concerns regarding flooding
- **PCC Highways Authority:** No Comments
- **PCC Drainage:**
- **Tree and Landscape Officer:** No Objection subject to conditions
- **Mid & West Wales Fire & Rescue:** No objections
- **Mining Remediation Authority:** No Objection
- **PCC Access Officer:** Baby changing facilities should be separate from disabled users toilets / queries regarding the turning circle for wheelchairs
- **Dwr Cymru/Welsh Water:** No objection subject to conditions
- **PCNPA Ecologist:** No objection subject to conditions

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*.

4 letters of support have been received from properties in Newgale. Their reasons for support include:

- Much need investment
- Better visual impact
- Promotion of visitor experience
- External lighting should be subdued and only visible when the campsite is open
- If the new building is well designed then the visual impact may be reduced
- Reduced flood risk from Brandy Brook
- Important tourist site
- The new building will not be visible from the beach

The Community Council comments read as follows:

Nolton and Roch Community Council OBJECT to the proposed development in principle. [Application: NP/24/0567/FUL]

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. It is considered that the increased scale of the building, together with the prominent visual location would result in an unacceptable landscape impact. The proposed building would be located away from the existing toilet block and further away from the main settlement of Newgale. In this location the building would be set within an open and exposed context, both visually and physically, and would not relate to any other existing permanent buildings in the sensitive beachfront landscape. Furthermore, the existing building in its current location is not visible from the beach owing to the low-level elevation on land behind the shingle bank.

From the proposal, members feel the new position would indeed make the building visible from the beach.

The majority of the campsite which is the subject of this application is located within a Coastal Change area as defined by the authority. If one considers the predicted sea level rises and coastal erosion processes as provided by Pembrokeshire County Council and advisors, a significant amount of the beachfront campsite will succumb to the sea, therefore members question the needs for increased facilities long term. When considering the Well-being of Future Generations (Wales) Act 2015, it would be inappropriate to consent a large-scale building today which would knowingly become surplus to future requirements. With consideration, members therefore feel the proposed increase in facilities is disproportionate for both current and future demand.

Furthermore, members have significant concerns that the extra facilities (toilets, showers, urinals, and basins) will simply result in more pitches on an already concerningly high-capacity campsite. Members note that the supporting Design and Access Statement quotes the following: "2.6 The Authority have already acknowledged that the current licence for 120 units could, with planning approval, be

increased proportionately by providing more toilet/shower facilities and it is estimated that the maximum number of units could almost be doubled on that basis. The applicant has stated that several national events companies have expressed an interest in Newgale Campsite hosting weekend events/festivals in this and future years.”

Members feel the current number of facilities is both sufficient and compliant for the size of the campsite. Any increase in the number of pitches on site would increase health and safety risks (predominately fire and vehicle movements) for patrons of the campsite and would also be detrimental to the character of the sensitive landscape of the National Park. Members feel the proposal for increased facilities, increased pitches and the notion of festivals and events with large numbers of people would be an excessive commercialisation of Newgale known for its special landscape qualities within the National Park.

In conclusion, members feel there is negligible difference between this revised proposal

NP/24/0567/FUL and the former proposal NP/23/0534/FUL which was previously refused by the authority on the grounds of visual intrusion into the sensitive landscape of the National Park, concerns also raised and held by members of Nolton and Roch Community Council previously and with the revised proposal herewith.

We do not support this application and have in-principle objections as outlined within’.

Policies considered

National Policy

All planning applications in Wales need to be determined in accordance with the statutory National Development Plan:

- [Future Wales: The National Plan 2040](#) (FW)
- [Planning Policy Wales 12](#) (PPW12).

Technical Advice Notes

The Future Wales Plan should be seen and read as a whole, and in conjunction with National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) as well as considering the following Welsh Government Technical Advice Notes (TAN's) www.gov.wales/technical-advice-notes:

- TAN 5 – Nature Conservation and Planning
- TAN 12 - Design
- TAN 15 – Development and Flood Risk

Local Development Plan 2 (Adopted September 2020)

Additionally, within the Pembrokeshire Coast National Park, The Local Development Plan 2 (LDP2) is also the relevant development plan with the following policies being applicable to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 9 Light Pollution
- Policy 10 Sites and Species of European Importance
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)

- Policy 30 (Amenity)
- 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)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of Pembrokeshire Coast National Park website: <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/01/LDP-Text-for-Adoption-Web.pdf>

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, and these may be material considerations in the determination of any future application made. In respect of the proposal the most relevant SPG's are:

- SPG - Landscape
- SPG - Seascape
- SPG - Planning Obligations
- SPG - Caravan Camping and Chalet
- SPG - Sustainable Design and Development
- SPG - Biodiversity

Constraints

- Special Area of Conservation – within 500m
- Safeguarding Zone
- Ancient Monument – within 500m
- Hazardous Zones
- ROW Coast Path – within 10m
- Potential for surface water flooring
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- Affordable Housing Submarkets
- Seascape Character Areas
- Landscape Character Areas

Relevant Planning History

- **NP/98/0349** Certificate of Lawfulness Application for use of camping site for tents and dormobiles - Granted October 1998
- **NP/12/0571/FUL** for change of use of 30 tent and dormobile pitches to 30 touring unit pitches – Approved February 2013)
- **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 23rd 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 6th September 2023
- **NP/23/0124/FUL** Appeal – CAS-03308-M9M1L2 – Dismissed 27/09/2024
- **NP/23/0527/FUL** – Change of use of former public toilets to takeaway ice cream parlour/coffee bar with toilet facility for public use and disabled parking space – Approved 09 July 2024 (approval for a temporary permission up until 1st February 2034 supported by a legal agreement).

1 Officer's Appraisal

Site and Proposed Development:

- 1.1 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.
- 1.2 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, which has recently been granted approval for a small ice-cream and coffee shop.
- 1.3 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 have become lawful through not having been formally enforced against within the relevant period. Centrally located on the north-eastern perimeter of the site is a utilitarian low scale flat roofed toilet/shower block.
- 1.4 This application is a re-submission of an earlier application in 2023 (NP/23/0534/FUL) which was refused at Committee in March 2024. No Appeal was lodged against the decision. The majority of the site is affected by flood risk and a majority is also within the coastal change area as identified within the PCNPA LDP2.

Current Proposal:

- 1.5 A new building is proposed approximately 75 metres to the south east of the existing building (proposed for demolition) and which is to be located at a higher point within the site, in a location with less flood risk than the current site and to a location just outside of the coastal change area. The proposed building is significantly larger than the existing building and the location on the higher ground will remove it from the flood zone, although the access road will remain within the flood zone.

- 1.6 This building takes the form of an 'L' shape with a variety of roof styles and connected in the middle section with a flat roof.
- 1.7 A reception area of approximately 6.4 by 5 metres is proposed at the western end of the building, with a laundry behind, with 10 toilets/urinals and 6 shower cubicles for the men's facilities, an accessible WC/shower unit with baby changing in the centre, and a further 6 shower cubicles and 8 toilets in the female facilities. Lighting details have not been provided with the application and are suggested by the applicant's agent to be subject to conditions, if approved.
- 1.8 The building is proposed to be clad in black/grey seamed zinc and cedar cladding with the roofs being of grey metal profiled sheeting or blue/black slates.
- 1.9 The applicant has suggested the building will replace 3 existing reception caravans on site used for reception/storage and for a shop – however in planning terms these are currently unauthorised, with the exception of a single caravan which is authorised for the sale of food in the summer months, although the applicant has argued that these are ancillary to the existing use. The Authority has concerns that the storage of these caravans on site during winter months when the campsite is closed is unauthorised as they are no longer ancillary to the use of the site when that is not active. Storage of caravans is potentially not a use that would be supported in this visually sensitive landscape.
- 1.10 The applicant had suggested on the previous application that he would rescind the use of a mobile catering unit granted through a Certificate of Lawfulness in 2019 and which has been subject to a number of enforcement investigations relating to multiple units and to being on-site for longer than was approved. However, the mobile unit is only permitted for part of the year on a temporary basis and is now proposed for retention within this application.
- 1.11 It is considered that the location and scale of the building, together with the prominent visual location would result in an unacceptable landscape impact.
- 1.12 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.

2 Key Issues

The application raises the following planning matters:

Policy and Principle of Development

Countryside location

Site facilities policy

Existing uses

Flood Risk

Coastal Change

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

Amenity and Privacy

Biodiversity, Protected Sites, Green Infrastructure & Landscaping

Surface Water Drainage
Highways and Access
Coal Mining
Well Being

2.1 Policy and Principle of Development

2.1.1 Section 38 of *The Planning and Compulsory Purchase Act 2004* requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).

2.1.2 Future Wales – The National Plan 2040 (FW), was adopted on 24th February 2021 and is the National Development Framework for Wales, and the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) of FW states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them.

Countryside location

2.1.3 The property lies outside any Centre Boundary as defined by Local Development Plan 2 and is therefore classified as Countryside. In line with national planning policy, Policy 7 of the Plan (Countryside) strictly controls new development in the countryside and details the types of development that are acceptable, in principle. This includes rural enterprises, tourist attractions or recreational activities where the need to locate in the countryside is essential.

2.1.4 The site is an existing campsite adjacent to the coast at Newgale, with the majority of the site lying within the C2 flood zone as defined by the Development Advice Maps and within Flood Zone 3, as defined on Natural Resources Wales Flood Map for Planning. The majority of the site also lies within a Coastal Change Management Area.

2.1.5 The application proposes the demolition of an existing toilet and shower block which lies within the flood zone and its replacement with an extended facility incorporating a laundry and reception office outside the flood zone. This is a revised application following the refusal of a similar application (NP/23//0534/FUL). The refused application was for a replacement building of 237 square metres which included a takeaway facility. The current application has reduced the size of the building to approximately 160 square metres and has removed the takeaway element, instead retaining the mobile catering unit which benefits from a Certificate of Lawful Development.

2.1.6 Whilst the size of the proposed facility has been reduced, the location, on higher ground, outside of the flood zone remains the same as the refused application. The proposed building still represents an increase in size from the previous application, where the elevated location will also increase the visual impact. The site is located in a wide, open valley flood and the photograph shown in the Authority's Landscape Character SPG demonstrates how clearly the existing buildings within the campsite can be seen. The proposed building in this location would have a significant visual impact on this stretch of the

coast. Policy 14 (Conservation of the Pembrokeshire Coast National Park) of the Local Development Plan 2 seeks to protect the special qualities of the National Park. It does this by controlling visual impact and ensuring that developments are not insensitively and unsympathetically sited within the landscape, among other things. Policy 8 (Special Qualities) of the Plan lists the undeveloped coast as a special quality of the National Park and despite the proposed reduction in size, concerns remain regarding the impact on the qualities and special landscape and seascape character of the National Park.

- 2.1.7 The planning statement submitted a part of the application states that by providing more toilets and showers, the maximum number of units that could be accommodated on the site could feasibly be double that of the 120 units the site is currently licenced for. It also states that several national events companies have expressed an interest in Newgale campsite hosting weekend events and festivals. However, later in the statement, it is stated that the proposal seeks to improve camping facilities at the site rather than facilitate an intensification in the use of the site. Clarification has been sought from the applicant regarding the intention to intensify the use of the site should the proposal to replace and extend the existing facilities be considered acceptable.
- 2.1.8 Any increase in pitch numbers could have an increased impact on the visual impact of the site but falls outside of the scope of the planning application for consideration as the Certificate of Lawfulness which was historically granted did not control pitch numbers. It is only the increase in scale of this building which can be considered as material. Whilst the applicants have taken into account the floor area of 2 temporary caravans and a trailer which have been used as a reception/shop/lawnmower storage, these do not benefit from planning permission. The Authority considers that use of touring caravans as a reception area may be ancillary use when the site is in active use, but this is limited to the period during which the site operates. No year round use of the temporary caravans for reception is authorised and the current storage of the caravans in winter months on site is considered unauthorised. The Authority does not consider therefore that their floorspace should be included as part of the baseline for assessing existing authorised floorspace within the site. The temporary caravans are sited on land covered by the Certificate of Lawful Use and not within the area then covered by NP/12/0571 but it is also noted that there is a restriction for the number of touring caravans which may be sited which is restricted to no more than 28 days at a time from NP/12/0571.
- 2.1.9 The development of a facility to enable the intensification of a use within the floodplain does require careful consideration, as this is a use which would be considered as a highly vulnerable use in accordance with TAN 15, would be contrary to national planning policy. Planning Policy Wales requires planning authorities to adopt a precautionary principle of positive avoidance of development in areas of flooding from the sea or rivers; to TAN15 and to Policy 34 of LDP2 which directs development away from those areas at risk of flooding. It is noted that Planning Policy Wales (paragraph 6.6.22) states the need to consider the potential consequences of flooding and not just the likelihood of an event occurring. Policy 35 of the LDP 2 also references the risks of intensification.
- 2.1.10 This would include damage to buildings, contamination of potable water and the mixing of sewage with flood water. It should also consider access and egress. NRW have noted in their consultation response that the entrance for the site

and therefore to the proposed building is within flood zone 3. The potential for damage from debris from stormy seas in this high-energy location must also be considered.

2.1.11 In addition, the holding of events and festivals has the potential to have an adverse impact on the amenity of neighbouring properties. Whilst the applicant has stated that the use for events does not require permission, as the events would take place 'within the curtilage of a building' permission would be required for these.

2.1.12 In this particular location the Shoreline Management Plan has indicated a policy of coastal adaptation and that is effective from the current time. The instability of the shingle bank now affords little protection to a significant potential for flooding of the campsite at Newgale. Particular consideration must be given to the need for the creation of a large new facility here for a camping site at such great risk from inundation from the sea.

2.1.13 The West of Wales Shoreline Management Plan 2 Section 4. Coastal Area A; states under Key Management issues: "*The natural defence at Newgale is overtopped quite regularly and under severe conditions this has caused significant flooding and disruption to the main road.*"

2.1.14 The Planning Statement submitted with the application states at paragraph 3.11 '*The shingle bank at Newgale has overtopped many times and with rising sea levels, this is expected to become a more frequent event (the A487 also gets blocked due to flooding). Rising sea levels and higher frequency of flooding will obviously then affect more of the campsite, particularly outside the main season during the winter storms. Other than the re-profiling of the shingle bank under managed realignment, there is no flood defence scheme with the continued defence of the bank expected to become unsustainable in future years.*'

2.1.15 It must be questioned whether approving a larger permanent building, just outside the flood plain to facilitate a use entirely within the flood zone represents a sustainable planning proposal. Planning Policy Wales (edition 12, 2024) reference the need to plan for the long-term, respecting environmental limits.

Site Facilities:

2.1.16 Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites) supports development of retail and other facilities on camping, chalet and caravan sites where it can be demonstrated that the facility is not already available in the vicinity; and the scale and design of the facility is in keeping with the surrounding area; and the vitality and viability of retailing and services in nearby Centres are not adversely affected. The proposed use would replace and supplement an existing use on site and therefore this facility is not already available. There is no concern regarding potential impacts on services in nearby Centres. As detailed in more depth in the section on design, there are however concerns regarding the scale and design of the facility.

Existing Uses:

- 2.1.17 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.
- 2.1.18 There are also 2 existing caravans on site which together form a total of approximately 78 sq metres in size as referred to above. These are however currently unauthorised and have not benefitted from express consent. Whilst the applicant states these should be considered as 'ancillary' to the use of the campsite, the retention of the caravans on site whilst the campsite is closed cannot be viewed as 'ancillary' and this storage use is considered to be unauthorised by the Authority.
- 2.1.19 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.
- 2.1.20 The removal of the existing toilet/shower block from a location within flood risk with a floodspace of just over 117 sq metres is a material consideration. However, the Authority does not consider there is sufficient justification for increasing the footprint above this size. The 2 caravans are not authorised year around. It is recognised that their use may be ancillary whilst the site is in use under the terms of the Certificate of Lawfulness, but there is no authorised basis for their storage in winter months when the site is closed. Their floorspace therefore should not be considered as an authorised year around floorspace. Whilst the mobile catering unit benefits from a certificate of lawful use, this is only on a seasonal basis for limited hours.

Flood risk:

- 2.1.21 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 slightly 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.
- 2.1.22 NRW's Flood Risk Map confirms the site is in Zone A of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004).
- 2.1.23 The Flood Map for Planning identifies the application site to be at risk of flooding and falls partially within Flood Zone 2/3 Sea. NRW have reviewed the Flood Consequences Assessment (FCA) entitled "Development of New Toilet Block at Newgale Campsite Flood Consequence Assessment Report" completed by Francis Sant Limited dated October 2024 reference C/WD/P/2408.
- 2.1.24 The FCA has undertaken a thorough assessment of the flood risk to the area including tidal and fluvial risk. From reviewing the fluvial risk, the new building is expected to be flood free in the 0.1% Annual Probability of Flooding (APF)

Scenario. It is noted that in an extreme event, the access road could flood to depths of 200mm with a low flood velocity. This would comply with TAN 15. When the tidal risk is considered, the site will be flood free in the 0.1% APF Scenario with an allowance for climate change. However, the FCA fails to address the wider implications of the Coastal Change Management Areas as required by Policy 35. This is discussed in greater detail below.

2.1.25 It is noted within the FCA that the sites access road will remain at risk and be at risk in the future events.

Coastal Change:

2.1.26 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.

2.1.27 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.

2.1.28 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 Relocation and replacement of development (other than residential) affected by coastal change). This policy 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.

2.1.29 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.

2.1.30 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 (Relocation and replacement of development (other than residential) affected by coastal change).

2.1.31 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 160 sq metres in terms of its gross internal area with a width of 27 metres along its frontage. This is a significant increase in scale on a more highly visible site, which is discussed in greater detail below. The proposal therefore does not currently comply with criterion c of Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change).

Summary of policy position:

2.1.32 In summary, the proposal raises policy concerns regarding the potential impact on the special qualities of the National Park and its landscape. These are discussed in greater detail below. Whilst not within the flood area itself, there are questions as to whether a larger facility above the size of that currently authorised on site might lead to wider intensification of use of the area of site within the flood plain.

2.1.33 Whilst the applicants claim not to wish to intensify the use, as the site benefits from a Certificate of Lawfulness, there is no ability to condition a restriction of numbers, and such a restriction could only be placed on the site through a legal agreement relinquishing unlimited numbers on the wider site. A greater size of building is also contrary to the requirements of policy 37 (Relocation and replacement of development (other than residential) affected by coastal change) of LDP2 which supports relocation of facilities immediately outside the coastal change area where these are comparable in size to those displaced.

2.1.34 In proposing a design and scale of facility which is not in keeping with the character of the surrounding area the proposal is not considered to comply with Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites).

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

2.2.1 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.

2.2.2 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'.

- 2.2.3 Policy 8 (Special Qualities) 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.
- 2.2.4 Policy 14 (Conservation of the Pembrokeshire Coast National Park) 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.
- 2.2.5 Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness (criterion (a)).
- 2.2.6 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 application does not contain details of the level of advertising or lighting required, and full information has been requested.
- 2.2.7 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.
- 2.2.8 As set out above - the proposed building is larger in scale than the existing with a Gross Internal Area of 160m², over a 43m² increase on the gross internal floor area of the existing building on site.
- 2.2.9 The building has been reduced by 10 metres in length, to 27 metres from the previous applications 37 metre length, primarily due to the removal of the take-away facility. It is worth noting that a coffee shop/ice cream shop has also been approved to the western end of the campsite since the last application on this site was refused.
- 2.2.10 This is significantly longer than other elevations within Newgale - for example The Duke of Edinburgh Inn at approximately 22 metres. 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.

- 2.2.11 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.
- 2.2.12 NRW have raised concerns regarding the potential landscape impact created by the proposed building. They have stated: *'In our previous response dated 5th December 2023 (CAS-242661-W2J8) we noted that 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. We note that a site-specific landscape appraisal has not been carried out and advise that your Authority seeks evidence to demonstrate how the development would integrate successfully into the sensitive landscape context at Newgale and would conserve and enhance the character and natural beauty of the PCNP in accordance with Planning Policy Wales'*.
- 2.2.13 These concerns are shared by Officers. Whilst a simple low-key agricultural building style was previously suggested by Officers in informal discussions, no pre-application advice was sought on the design or scale of this building prior to its formal submission, and the current proposal is considered to be poorly designed in terms of the cohesion of its design and lack of reference to either character of vernacular buildings in the landscape, and the bulk and scale of the building.
- 2.2.14 The proposal is considered likely to result in an intrusive development which would harm special qualities including the landscape character of the Pembrokeshire Coast National Park in this location. This is contrary to the provisions of Policy 8 (Special Qualities), Policy 14 (Conservation of the Pembrokeshire Coast National Park) and Policy 29 (Sustainable Design).

2.3 Amenity and Privacy:

- 2.3.1 Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:
- a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
 - b) the development is of a scale incompatible with its surroundings; and/or
 - c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
 - d) the development is visually intrusive.
- 2.3.2 Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
- 2.3.3 There are no concerns in terms of any impact upon residential amenity given that there are no nearby neighbouring properties.
- 2.3.4 There are, however, concerns in terms of the proposal's compatibility with its surroundings as discussed above. Officers consider that it is likely that the building will be perceived as visually intrusive within the wider landscape.

2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping

- 2.4.1 PPW12, TAN5 and LDP2 Policy 11 (Nationally Protected Sites and Species) requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat. The PCNPA Ecologist has been consulted and has advised that an EPS licence is not required in this instance and there is a reasonable likelihood that bats will not be affected by the development. She has identified that were the development to be approved a Construction Environmental Management Plan (CEMP) would be necessary to ensure that matters of N construction, biodiversity management during construction, soil management, resource management and pollution protection as well as construction phase lighting were properly controlled. However subject to this condition the proposal would be acceptable with regard to matters of biodiversity and protected sites.
- 2.4.2 To comply with Planning Policy Wales 12 (2024) and the *Environment (Wales) Act 2016*, planning authorities are expected to ensure every development positively contributes to biodiversity.
- 2.4.3 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.
- 2.4.4 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.
- 2.4.5 Proposals which fail to harmonise with or enhance the landform and landscape of the National Park do not meet the criteria of Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park Authority). The proposal is considered to meet the requirements of Policy 11 (Nationally Protected Sites and Species) as well as TAN 5 and Planning Policy Wales in relation to biodiversity, however this is not sufficient to outweigh the other material considerations and policy conflict identified above.

2.5 Drainage

- 2.5.1 The developer has indicated that foul flows are to be disposed of via the public sewerage system and the surface water is to be drained to a soakaway. DCWW have no objection to the proposal but have suggested a condition would be necessary to ensure that there is no detriment to the public sewerage system.
- 2.5.2 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. No objections have been raised by the Drainage Engineers.

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

2.6 Highways & Access

2.6.1 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.

2.6.2 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.

2.6.3 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. A public bus service runs along the main road.

2.6.4 The Highways Authority have been consulted. They have raised no objection to the development. The proposal is not considered to raise any highway concerns and to meet the criteria of Policy 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

2.7 Other Material Considerations: Coal Risk

2.7.1 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 (now renamed as the Mining Remediation Authority) have reviewed the Risk Assessment on the previous application and concluded that the application site is safe and stable for the proposed development.

2.8 Well-being

2.8.1 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.

2.8.2 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.

3 Conclusion

- 3.1 The proposal is to replace an existing facility serving the current campsite with a new building. The new building would involve the relocation outside the current flood risk area to a location not at flood risk and immediately outside the identified Coastal Change area.
- 3.2 Whilst the move outside the flood risk area is supported by local policy – the larger footprint proposed is not and represents a conflict with Policy 32 of LDP2. Whilst the application site for the building has been selected to avoid the flood risk area, the whole area of the use associated with the proposed building is liable to significant coastal change, including movement inland of the shingle bank and inundation from the sea.
- 3.3 The potential consequences of flooding in this location are significant and erection of new buildings at a larger scale than those authorised within the site on a permanent basis to serve a campsite at serious risk of flooding are contrary to national and local planning policies to reduce risk to life and property from flooding.
- 3.4 Due to its scale, design and prominent location the proposal is also considered likely to result in a visually intrusive development which would harm special qualities including the landscape character of the Pembrokeshire Coast National Park in this location.
This is contrary to the provisions of Policy 8 (Special Qualities), Policy 14 (Conservation of the Pembrokeshire Coast National Park), Policy 29 (Sustainable Design), Policy 30 (Amenity) and Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites) of LDP2.
- 3.5 Insufficient information has been provided regarding landscaping to provide assurance that the proposal can acceptably harmonise with or enhance the landform in this location (contrary to the requirements of Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park)).
- 3.6 Matters of drainage, highways access, coal risk and biodiversity are acceptable, or could be addressed through appropriate planning conditions, however these are not sufficient to outweigh the material considerations and policy conflicts identified above.

4 Recommendation

It is recommended that the application be **Refused**, for the following reasons:

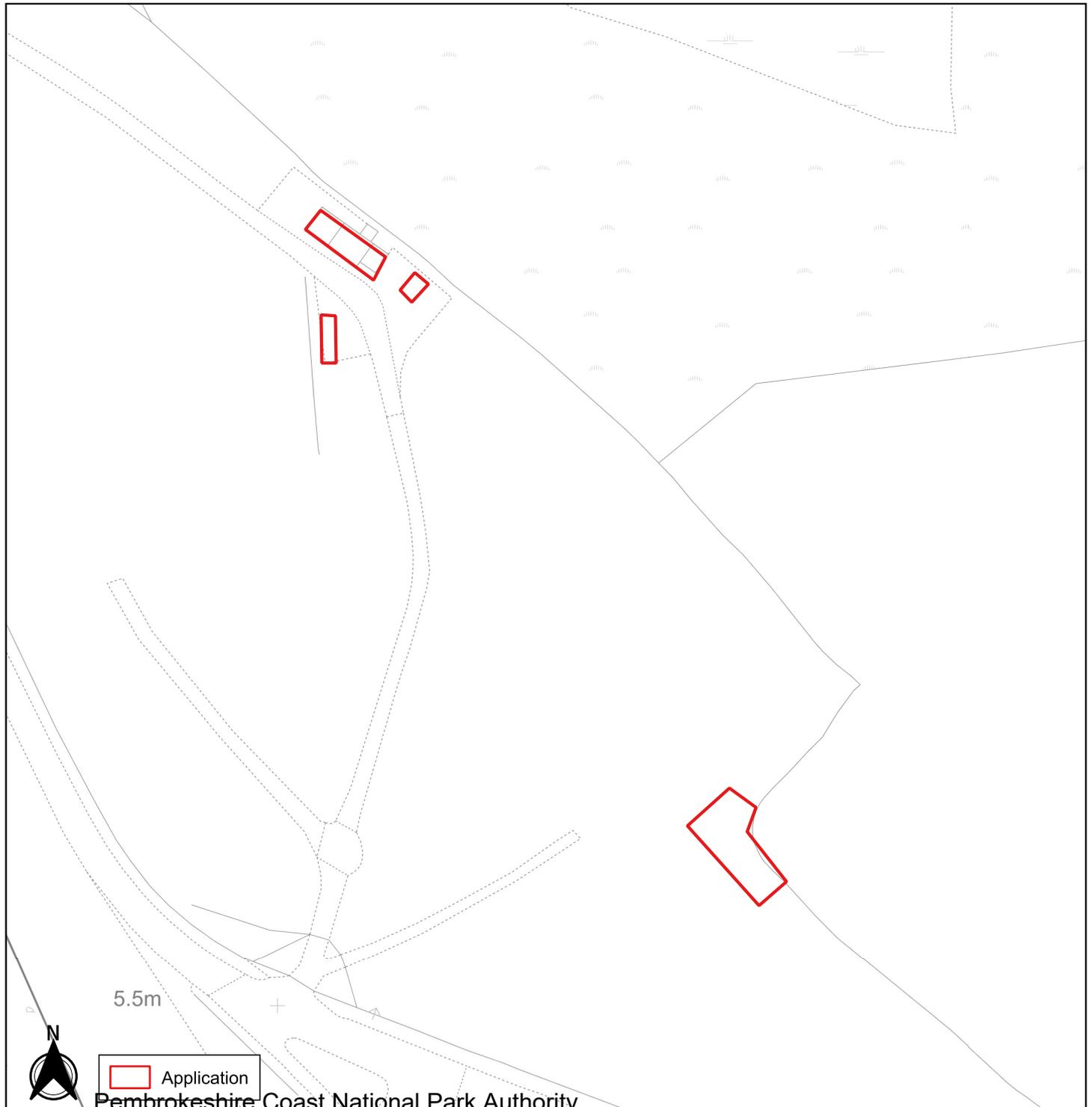
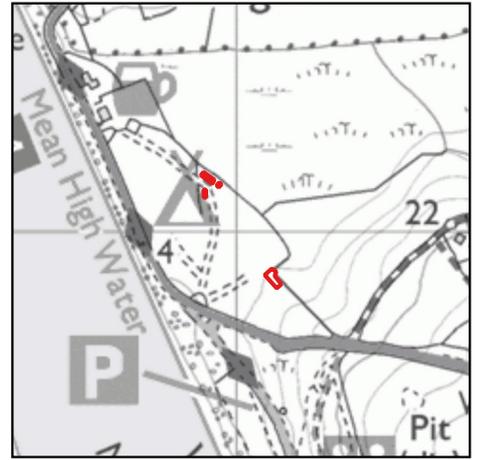
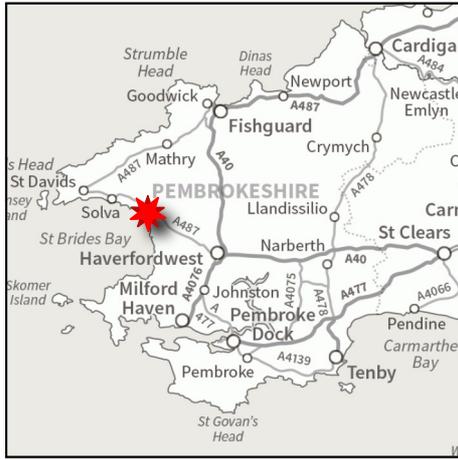
1. The application represents an unsustainable form of development which may lead to an intensification of a use within a defined flood zone, contrary to the principles of PPW12 paragraph 1.2, 2.5 (long-term benefit), it is also of a larger scale than existing authorised buildings on site and would therefore be contrary to the requirements of Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change) and Policy 35 (Development in the Coastal Change Management Area).
2. Due to its scale, design and prominent location the proposal is also considered likely to result in a visually intrusive development which would

harm special qualities including the landscape character of the Pembrokeshire Coast National Park in this location. This is contrary to the provisions of Policy 8 (Special Qualities), Policy 14 (Conservation of the Pembrokeshire Coast National Park), Policy 29 (Sustainable Design), Policy 30 (Amenity) and Policy 42 (Site Facilities on Camping, Chalet and Caravan Sites). Insufficient information has been provided regarding landscaping to provide assurance that the proposal can acceptably harmonise with or enhance the landform in this location (contrary to the requirements of Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and SPG on Sustainable Design).



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250



Application

Pembrokeshire Coast National Park Authority