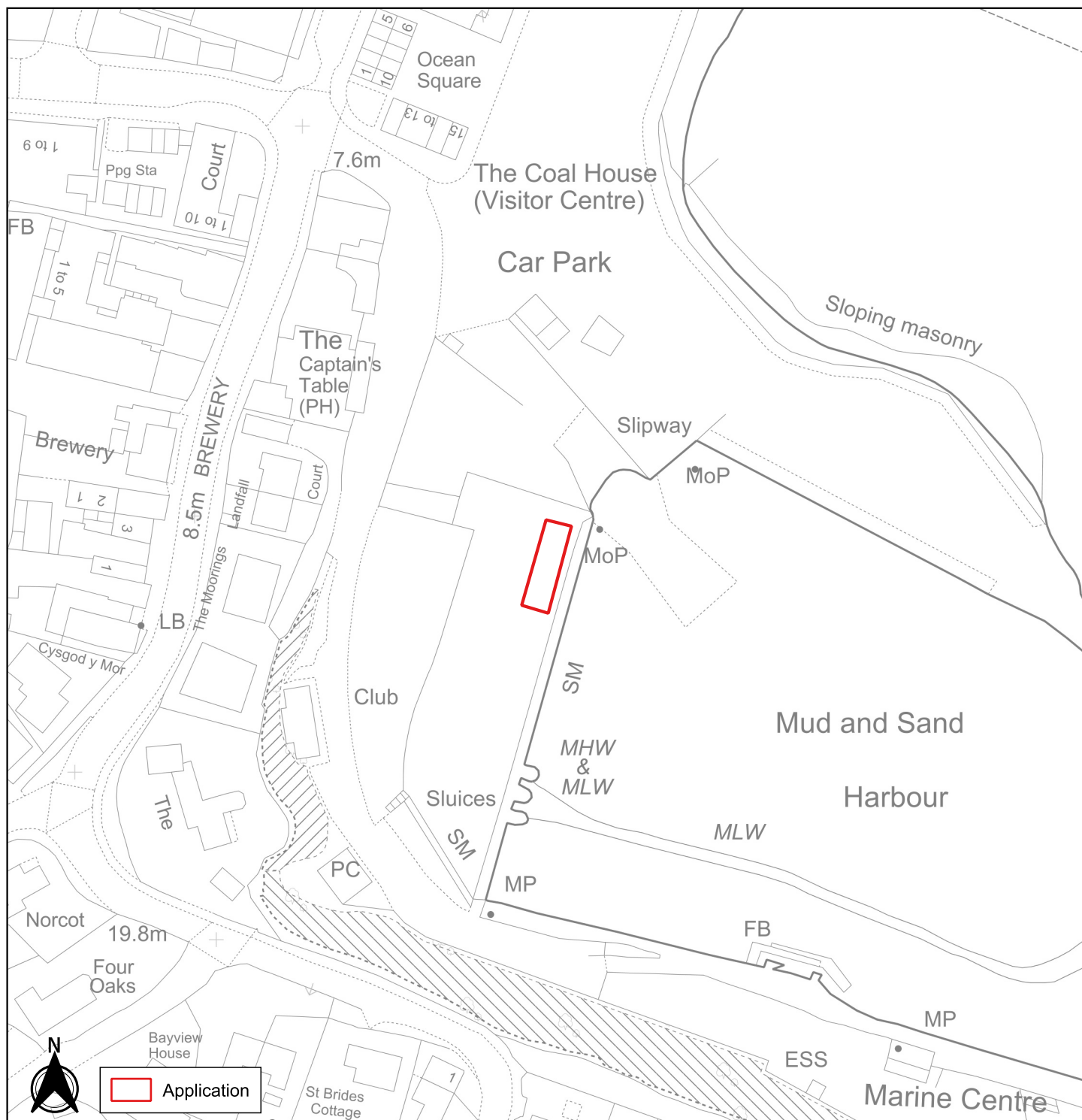
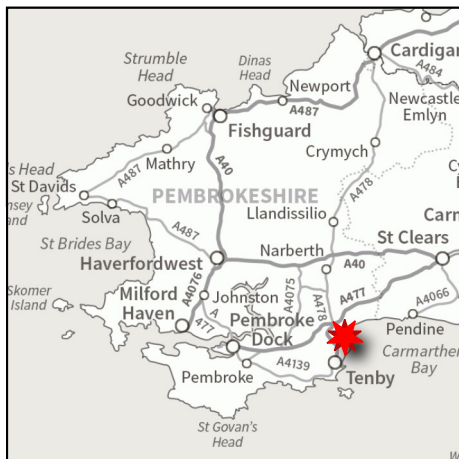




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:1,250



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



Ref No: NP/25/0137/FUL
Proposal: Change of use from interpretation centre to mixed use interpretation centre with Rum themed bar (A3)
Site Location: The Coastal Schooner, The Harbour, Saundersfoot, Pembrokeshire, SA69 9HE
Recommendation: Refusal

The application is being brought to Development Management Committee in accordance with the scheme of delegation as it has been called in by a member of the Authority.

Summary:

The application site is part of the Coastal Schooner building which is located on the deck area over the sluice facility within Saundersfoot Harbour. The building is a replica of a traditional coastal schooner vessel which operated from the harbour during the coal mining era to transport coal from Saundersfoot. The existing structure comprises a side main entrance into the interpretation area within the middle section, an associated small cinema area is located within the bow area and a café is located to the stern area with a separate access, and all this is accommodated within the hull section of the building.

The current proposal seeks to provide a new A3 use within the interpretation area to accommodate a 'Rum Themed Bar' with the remaining area to be retained as an interpretation area. No external alterations are proposed as part of this application.

The current application for a new A3 use within the existing Coastal Schooner is considered to fall outside of the defined retail area for Saundersfoot which is where these uses are to be sited to fall in line with Welsh Government sequential test to locate retail development within defined areas to promote a 'Town Centres First' policy.

In addition to this concern, the new use will also create a greater concentration of A3 uses within a small area within Saundersfoot where there is a mix of residential and commercial and is considered to be likely to impact on the amenity of the area and especially nearby residential dwellings either directly or in combination with other A3 uses and cannot be supported by officers.

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

Consultee Response

- Saundersfoot Community Council: Object
- PCNPA Buildings Conservation Officer: No adverse comments raised
- PCNPA Ecologist: No response to date
- PCC Transportation and Environment: No adverse comments raised
- PCC Access Officer: No response to date
- Cadw: No response to date

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*.

One letter of objection has been received which raises the following issues:

- The original boat concept was conceived as part of a much larger development within the harbour area which was supported by funding, loans and grants
- The old coal office and schooner both provide valuable heritage interpretation for Saundersfoot and the harbour on its coal industry past
- The overall scheme was designed in collaboration with local community groups which were an integral part of the funding application
- There is no history of the harbour area being a recreational area or provision of drinking establishments, but there is evidence of coal shipments which shows that the proposal is totally out of context
- Saundersfoot is already well provided with licensed premises and hospitality establishments
- Compared to many heritage sites in Pembrokeshire and further afield there has been very little promotion advertising and marketing of the attraction, together with the attraction being closed for much of the time
- The space inside the schooner is comparatively small which at busy times and
- during poor weather could result in overcrowding;
- The deck area, if used, is unsuitable for social gatherings, especially with
- alcohol, due to its height above ground and comparatively low barriers
- The masts and rigging are also dangerous if there are attempts to climb;
- The Harbour is a working environment and there are warning signs in place.
- Drinking and possible intoxication are clearly dangerous within this environment.

Where material, these concerns are discussed in the main body of this report.

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 4 – Retailing and Commercial Development
- TAN 5 - Nature Conservation and Planning
- TAN 6 – Planning for Sustainable Rural Communities
- TAN 11 – Noise
- TAN 12 – Design
- TAN 13 – Tourism
- TAN 14 – Coastal Planning
- TAN 15 – Development and Flood Risk

- TAN 18 – Transport
- TAN 23 – Economic Development
- TAN 24 – The Historic Environment

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 04 Saundersfoot Local Centre (Tier 2) (Strategy Policy)
- Policy 08 Special Qualities
- Policy 11 Nationally Protected Sites and Species
- Policy 14 Conservation of the Pembrokeshire Coast National Park
- Policy 29 Sustainable Design (Strategy Policy)
- Policy 30 Amenity
- Policy 34 Flooding and Coastal Inundation (Strategy Policy)
- Policy 35 Development in the Coastal Change Management Area
- Policy 38 Visitor Economy (Strategy Policy)
- Policy 54 Community Facilities (Strategy Policy)
- Policy 56 Retail in the National Park (Strategy Policy)
- Policy 57 Town and District Shopping Centres
- Policy 59 Sustainable Transport (Strategy Policy)
- 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:

- Archaeology
- Biodiversity
- Coal Works
- Conservation Areas
- Parking Standards
- Sustainable Design and Development
- Seascape
- Landscape

Constraints

- Conservation Area Saundersfoot
- LDP Coastal Risk Area
- Technical Advice Note 15 - C2
- Special Area of Conservation - within 500m
- Special Protection Area - within 500m
- Biodiversity Issue
- Ancient Monument - within 500m

- Potential for surface water flooding
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- Affordable Housing Submarkets
- Seascape Character Areas
- Landscape Character Area

Relevant Planning History

- NP/14/0445 – Construction of new slipway from harbour area to beach, installation of two/three tier dry racking system for boat storage on harbour, installation of inner harbour landing pontoon and access bridge, installation of decking over sluice, Demolition of Jones and Teague Buildings – Approved 09/12/2014
- NP/15/0043/DOC – Discharge of condition no. 5 of NP/14/0445 – Discharged 10/02/2015
- NP/15/0072/DCO – Discharge condition no. 7 of NP/14/0445 – Discharged 03/03/2015
- NP/15/0250/DOC – Discharge of Condition no's 9 & 10 of NP/14/0445 – Partial discharge 12/06/2015
- NP/15/0302/DOC – Discharge of Condition 6 and 12 of NP/14/0445 – Discharged – 14/07/2015
- NP/18/0210/NMA – Non-material amendment to NP/14/0445 – Approved 14/09/2018
- NP/18/0687/FUL – Proposed Coastal Schooner Centre (mixed use for education, exhibition space/heritage interpretation, meetings and refreshments facility, use classes D1 and A3) - Approved 01/05/2019
- NP/21/0415/DOC – Discharge/Removal of Condition No. 3 of NP/18/0687/FUL - Disabled Parking Plan – Discharged 16/09/2021
- NP/21/0803/FUL – Rationalisation of existing car park. Improve traffic flow and pedestrian areas, remove concrete apron trip hazard adjacent to promenade and replace with new access ramps from car park to promenade level. Re-site existing benches onto promenade level - Approved 21/09/2022
- NP/25/0089/FUL - Change of use to A3 – Cancelled 25/02/2025

1. Officer's Appraisal

Site and Proposed development

1. The application site is part of the Coastal Schooner building which is located on the deck area over the sluice facility within Saundersfoot Harbour. The building is a replica of a traditional coastal schooner vessel which operated from the harbour during the coal mining era to transport coal from Saundersfoot. The existing structure comprises a side main entrance into the interpretation area within the middle section, an associated small cinema area is located within the bow area and a café is located to the stern area with a separate access, and all this is accommodated within the hull section of the building. Access is then provided via an internal lift or via external stairs to the deck area above which comprises a further entertainment area for re-enactments and a high ropes facility within the mast rigging area.

Current Proposal

2. The current proposal seeks to provide a new A3 use within the interpretation area to accommodate a 'Rum Themed Bar' with the remaining area to be retained as an interpretation area. No external alterations are proposed as part of this application.

2. Key Issues

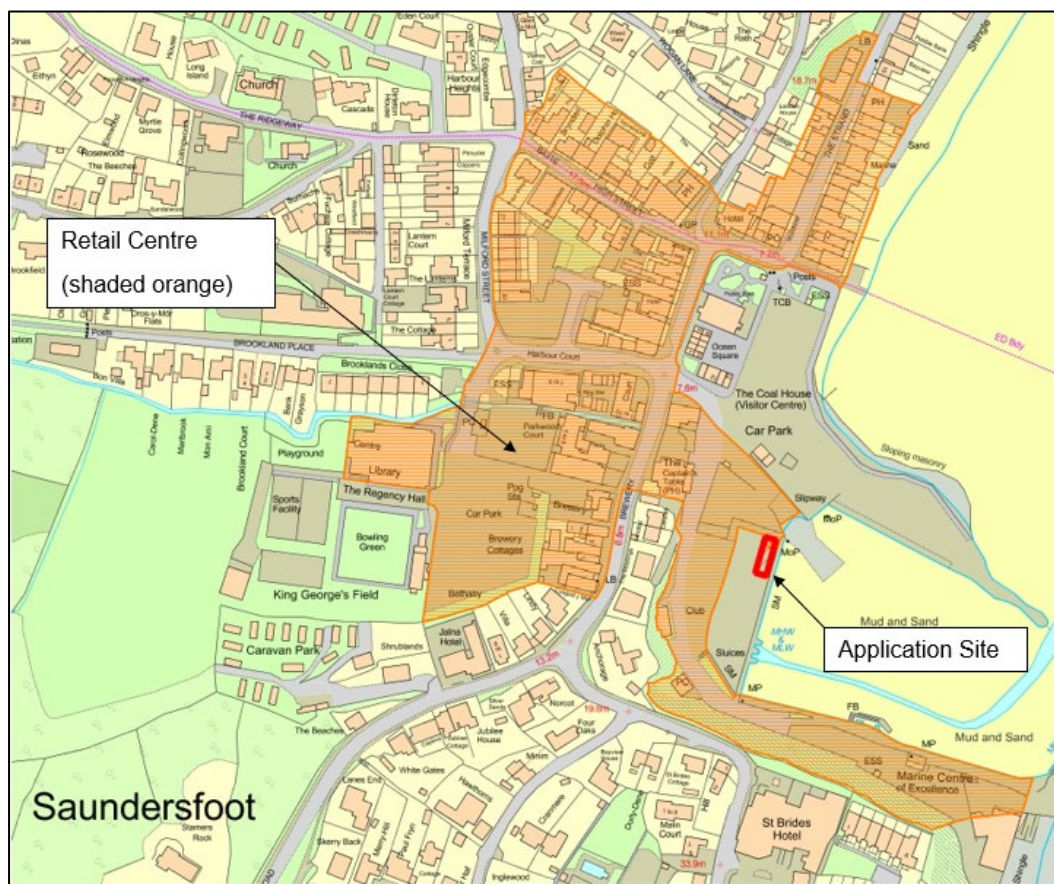
The application raises the following planning matters:

- 2.1 Policy and Principle of Development
- 2.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 2.3 Amenity and Privacy
- 2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 2.5 Access and Parking
- 2.6 Impact on Conservation Area and Scheduled Monuments
- 2.7 Other Matters

2.1. Policy and Principle of Development:

3. 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).
4. 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.
5. 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...*'.
6. The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty.
7. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.
8. PPW12 para 4.3.10 states 'Planning authorities should establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposal map.'

9. PPW12 para 4.3.18 states that 'The Welsh Government operates a town centre first policy in relation to the location of new retail and commercial centre development.'
10. Future Wales – Policy 6 (Town Centre First) states 'the principle of Town Centre First is well established in planning policy in relation to retail developments.'
11. Policy 56 of LDP2 seeks to protect and enhance the viability, vitality and attractiveness of the retail centre. New retail development which is of a scale and design appropriate to the centre and accords with the retail hierarchy will be supported. Proposals that would undermine the retail hierarchy or appearance of the centre and/or the amenity of neighbouring properties will not be permitted.
12. Policy 57 of LDP2 will permit new A3 uses where the scale, siting and design is appropriate and would contribute to the character and appearance of the area; and proposals for A3 uses would not individually or cumulatively cause an unacceptable adverse effect on amenity or the role of the Centre in meeting the needs of local communities and visitors.



13. Within the defined retail centre there is scope for new retail development, there are vacant retail units only a short distance away across the harbour area however, the Coastal Schooner building falls outside of the retail centre defined area. It is also noted that to the rear of the Schooner building there is an existing A3 use operating at present. In addition to this aspect the proposal will add to an existing concentration of A3 uses in a small area within Saundersfoot which could have a significant impact on nearby residential neighbours' amenity as there is a total of nine A3 uses within a 70m radius of the adjacent residential dwellings which is considered to cumulatively impact on the amenity of residents within this area.

14. Therefore, the principle of a new retail (A3) use within this building is not considered to be acceptable in principle and would be contrary to policies 56 and 57 of LDP2.

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

15. Policy 08 (Special Qualities), of 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. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique.
16. Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.
17. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
18. The current proposal will not alter any external aspect of the existing building and will be an alteration to the internal fitout of the existing interpretation centre to accommodate a new bar area, and no other alterations are proposed in association with the current application. Based on the level and internal nature of the proposed works the application is considered to be very small in scale and would not be considered impact on the Special Qualities of this area of the National Park given its location and scale.
19. However, when considering the proposal against policies 14 and 29, concerns are raised in how the proposal meets (criteria b) of policy 14 which states 'Development will not be permitted where this would have an unacceptable adverse effect on the locally distinctive characteristics by introducing or intensifying a use which is incompatible with its location.' In assessing the impact on the National Park, matters of detail and cumulative impact will be given special consideration.
20. Policy 29 (criteria c) seeks to ensure all proposals demonstrate an integrated approach to design in terms of community cohesion and health and this is linked to Policy 30 (Amenity).
21. Officer consider the proliferation of A3 uses in this area results in an adverse effect on the local distinctive characteristics of the defined retail area, there is a distinct line of where this ends and other non-retail uses operate. The current application is considered to blur the lines between the defined retail area and other non-retail areas and has the potential to cause significant impact on amenity of neighbours and cannot be supported for this reason.

2.3. Amenity and Privacy:

22. 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.
23. Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
24. For reasons already stated above within the report the current application is considered to have the potential to cause a significant impact on neighbours amenity both directly and in combination with other A3 uses within this small area. The proposed A3 (bar area) is to be located within a very small area within the existing building and the potential for the proposed use to spill out onto the adjacent deck area or via use of the upper deck area of the coastal schooner is considered likely and will not only impact on nearby neighbours but also impact on the amenity of the public area/family friendly area of the decking.
25. As such, officers consider that the proposal would be contrary to criterion a & c of Policy 30 of LDP2.

2.4. Biodiversity, Protected Sites, Green Infrastructure & Landscaping

26. 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.
27. 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.
28. Chapter 6 of Planning Policy Wales 12 states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.
29. It also states that a green infrastructure statement should be submitted with all planning applications and that the green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the stepwise approach has been applied.
30. A green infrastructure statement has been submitted in support of the application which follows the stepwise approach and is considered to be appropriate and proportional. The proposal will include native planting positioned in planters adjacent to the main entrance of the Schooner building. The planting will incorporate pollinators and will have native species. In addition lighting will be minimised to reduce light

pollution to nearby residential gardens and other areas of soft landscaping such as trees and hedges.

31. No response has been received from the Ecologist at this time and a further verbal report will be given at the meeting.

2.5. Access and Parking

32. Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that assist in delivering improved traffic and parking management.
33. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
34. The highway officers at Pembrokeshire County Council have considered the current application and do not raise any adverse comments in respect of access or highway safety as part of the current proposal. As such, the proposal accords with policies 59 and 60 of LDP2.

2.6. Impact on Conservation Area and Scheduled Monuments

35. The Authority's Buildings and Conservation officer has not raised any adverse comments on the current proposal given the works are all internal and there will be no impact on the character or appearance of Saundersfoot Conservation Area from a heritage and building conservation perspective.
36. Given that the works are internal officers have not consulted Cadw in respect of the potential impact on the nearby Scheduled Ancient Monuments located at Rhode Wood Shaft Mounds (PE458) and Tramroad Incline at Saundersfoot (PE479). Both of these monuments are located over 400 metres away from the site and have no direct intervisibility with the site given the topography change and intervening structures and landscaping.
37. Officers consider that there will be no impact on either monument from the proposed development given that there is no external alterations proposed.

2.7. Other Matters

38. Saundersfoot Community Council object to the current application and make the following consideration:
39. It is understood that the current use of the schooner was being retained as an interpretation centre along with café use at the stern of the building, the proposal as a rum bar raises concerns in this location and is considered to be at odds with the current family venue and heritage elements.

3. Conclusion

40. The current application for a new A3 use within the existing Coastal Schooner is considered to fall outside of the defined retail area for Saundersfoot which is where

these uses are to be sited to fall in line with Welsh Government sequential test to locate retail development within defined areas to promote a 'Town Centres First' policy.

41. In addition to this concern, the new use will also create a greater concentration of A3 uses within a small area within Saundersfoot where there is a mix of residential and commercial and is considered to be likely to impact on the amenity of the area and especially nearby residential dwellings either directly or in combination with other A3 uses and cannot be supported by officers
42. 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 lack of contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

4. Recommendation

Refuse, subject to the following reasons:

1. The proposed new retail (A3) use within this building is considered to fall outside of the defined retail area and is not considered to be acceptable in principle and would be contrary to policies 56 (Retail in the National Park and 57 (Town and District Shopping Centres) of LDP2.
2. The proximity of the proposed use to neighbouring dwellings is considered to be too close in this instance both directly and in combination with other A3 uses which will likely result in significant noise disturbance and will have an adverse impact on the amenity of the area and neighbours and be detrimental to the quality of the environment currently enjoyed at this location. The increase in noise impact resulting from close proximity to the proposed facility to neighbouring dwellings is considered to be contrary to criteria a & c of LDP2 Policy 30 (Amenity).