Application Ref: NP/13/0017

Application Type	Full
Grid Ref:	SM72442516
Applicant	Mr C Refoy, RNLI
Agent	Mr C Moore
Proposal	New lifeboat station, cliff top shelter, access and parking
Site Location	St Davids Lifeboat Station, St Justinians, St Davids, Pembrokeshire, SA62 6PY
Case Officer	Vicki Hirst

Summary

1.1 This is a full planning application with an accompanying Environmental Impact Assessment (EIA) for a new lifeboat station, associated cliff top shelter, vehicular access and car park, at St David's Lifeboat Station, St Justinian's.

1.2 It is considered that the development does not result in significant harm to the environment that would justify its refusal and is an acceptable scheme in design terms, with regard to the special qualities of the landscape and historic buildings and archaeology, highways matters, privacy and amenity, the water environment and drainage, and economic issues.

1.3 However, it is considered that the proposal would have adverse effects on the reef feature of the Pembrokeshire Marine European Marine Site, a Special Area of Conservation ("SAC") and as such the development is subject to the requirements of the Conservation of Habitats and Species Regulations 2010 and should only be permitted where it can be demonstrated that there are imperative reasons of overriding public interest that justify the development and that adequate compensatory measures are put in place in respect of the lost reef.

1.4 It is considered that it has been demonstrated in this case that the proposal meets an overriding public interest which, in this case, is related to human health and safety. The location of the lifeboat station has been fully demonstrated as the best option to meet the Royal National Lifeboat Institution's ("RNLI") commitments to the UK Government in providing a national Search and Rescue (SAR) service. The boathouse is an integral part of the facilities required to undertake this service.

1.5 As regards the provision of compensatory measures a further Appropriate Assessment required with the recently submitted compensation measures taken into account. Subject to the findings of the Appropriate Assessment concluding that the compensation measures offered are sufficient for the loss of the reef feature it is recommended that the application should be referred to the Welsh Government with a recommendation of approval on the grounds that

the development should proceed for imperative reasons of public interest (" IROPI") grounds.

1.6 The application has been referred to the Development Management Committee because it requires and has been accompanied by an EIA.

Consultee Response

Environment Agency Wales: Conditional Consent
St Davids City Council: Supporting
DAT – Conditional Approval
Environment Agency – Conditional Approval
Dwr Cymru Welsh Water: No comment to make as private sewage proposed
MOD: No objection - No safeguarding objections
PCC - Head of Public Protection: Conditional Consent
PCC - Transportation & Environment: Conditional Consent
PCNPA Conservation Officer: No objection
PCNPA Ecologist: Screening for Likely Significant Effects (LSE) under the Habitats Regulations concluded that there would be no LSE on the Ramsey and St Davids Peninsula Coast Special Protection Area (SPA) or St Davids Special Area of Conservation (SAC) but there would be LSE on the Pembrokeshire Marine SAC due to the permanent loss of part of its features and the application should therefore proceed to Appropriate Assessment. The Appropriate Assessment carried out concluded that there would be adverse impact on the reef feature of the Pembrokeshire Marine SAC with no compensation or mitigation offered for its loss.
PCNPA Rights of Way Officer/National Trail Officer: A diversion of extinguishment notice will be required for part of the National Trail and a creation order for a new path be made. This can be done under Section 257 of the Town and Country Planning Act 1990 following a grant of planning permission.

Public Response

3.1 The application and EIA have been advertised and neighbour notifications undertaken. Twelve responses have been received, which include a number of local businesses as listed below and several local residents. The main issues raised are:

- **Porthclais Harbour Authority** are in favour of the proposed new lifeboat station and its slipway, as the lifeboat is very important to boat owners and visitors, and the businesses that use the sea as their means of income;

- **Venture Jet Ltd** – find it difficult to object to the proposal because of the role they have, but is concerned that the slipway will not be used for leisure or working uses. Venture Jet provide mostly tourist based

boat trips, and employ 6 – 9 people, plus input tens of thousands of pounds into the local economy. The new station does not provide for continued slipway access to the businesses based in the area, which is key to the local economy. The application also provides an opportunity to address the problems facing St Justinian's: ie its protection, and the provision of toilet and parking facilities;

- **Porthstinian Boat Owners Association (PBA)** objects to the application. It is a significant intervention in the landscape and should only occur if there is a holistic consideration of all the interests of acknowledged importance at St Justinian. The PBA members employ up to 30 – 40 people, but the RNLI have not consulted its members adequately. The application needs to be supported with a plan for securing the future of the lifeboat, and a plan for safeguarding the employment use and its continued co-existence with the existing listed lifeboat station. The use of the old station should be included within this application. The RNLI have a legal obligation to provide uninterrupted access to the sea. If the use of the existing station is not secured then there will be a loss of all businesses and the associated jobs and income they bring to the area. The PBA want all stakeholders to meet and have an application that addresses all future access, transportation, parking and toilet facilities issues. The construction phase of the new lifeboat station will result in a 25% loss of trade and many job losses to PBA members. The application makes little reference to the socio-economic impact of the project apart from mentioning the re-sighting of PBA moorings. The negative publicity of having St Justinian's closed to business for tourism will take years to recover from. Construction traffic movements should be conditioned to take place out-of-season or at night. It should be a conditional requirement that construction traffic should seek to maintain the employment function of the site. The application provides an opportunity to solve the parking issues at St Justinian's which would be for the benefit of the whole community. Construction traffic will harm the highways infrastructure, particularly road surfaces. The works themselves will result in noise nuisance for tourists and residents, and the porpoise population. The preferred option is for a single station, with the removal or adaption of the existing one. Any new station should be cream and red in colour. If the full and unrestricted access presently enjoyed cannot be maintained over the existing station, then an alternative embarkation / disembarkation point must be established.

- **RSPB** object to the proposal. They feel that the National Park Authority has a duty to ensure that the potential disturbance effects of the proposed construction are fully mitigated and require assurance that their existing access rights are fully maintained both during and post construction. They are also members of the PBA and agree with all the points they have raised. The application should be used as an opportunity to solve some of the long-standing recreational and access issues at St Justinian's;

- **Mountain Hall Cottages** - objection is raised to the application because it does not take into account the wider implications of the impact of the proposal on the tourist industry. The major construction works will have a detrimental impact on the tourist industry of the area. If tourists have a negative experience they will not return. Tourism businesses should be maintained at their fullest extent, both during and after construction, so as not to have harmful economic impacts;

- **Robust Boats** – the application should be for the area as a whole, not just the new building. The disruption caused by the construction will last for a long time, and result in the loss of businesses and jobs. The RNLI have not had the courtesy to discuss the issues with any member of the PBA. The cost of moving moorings during the building of the new station will be prohibitive. The environmental and socio-economic responsibilities of the National Park Authority should not be ignored;

- **Pencarnan Caravan Park** – no-one has contacted the caravan park to let them know about the application. The Park should have been personally contacted as it will result in the loss of business. The RNLI are riding rough-shod over the residents and businesses of the area. Objection is raised to the application and legal advice will be sought;

- **Derek Rees** – the PBA will lose five moorings to make space for the new slipway, plus access to the sea from the existing lifeboat station. The effect on the businesses operating from them will be catastrophic. The application should be postponed until the RNLI have met all those that will be impacted by the development;

- **Quinquari** – as a nearby land owner the RNLI have not consulted with them about their proposals. The principle of the need for the new station is vague, and alternative options such as a helicopter or alternative vessel needs to be considered first. The new boat can be operated by using existing facilities and moorings. The RNLI has refused to enter into dialogue with the PBA. The application makes scant reference to the impact upon tourism: construction noise, vibration, visual impact, transport issues and vessel operations will all be seriously affected. The construction work will result in the loss of tourist revenue, including the closure of a nearby camp-site, prevent holiday lets from being occupied, and the use of car parks and agricultural grazing. There will also be a 25% reduction in boat trips from the area, rendering existing businesses unviable. Quinquari will experience the loss of 35 jobs and over £140,000 revenue. The RNLI should bring equipment in by sea to minimise disturbance to businesses. A transport plan needs to be agreed by the local community before planning permission is granted. Why can the RNLI be allowed to have major development whereas proposals for increased parking, toilets and infrastructure are not encouraged? The National Park's Conservation Officer has stated that this old station should be part of any application for a new one. The proposal will result in one new station, the old one that will have no use, and a new

slipway for other boat users. These issues could have been addressed if the RNLI had spoken to those affected by the proposal;

- **Others -** The new station will impact on jobs, including because of the loss of access from the old station. The application should include the future of the existing station and the continued access from it for the businesses that use it. The application should also include the ongoing issues of parking, access, and toilet facilities. The provision of two stations side-by-side will have a detrimental impact on the area. The traffic impact of the proposal will restrict visitors using the site. A number of moorings would be lost, and although it is suggested in the application that they could be relocated there is very little suitable space to do this. There is an agricultural covenant on the land proposed for parking. The new station will make the area look like Barry Docks. Is the existing station going to be demolished? Pembrokeshire County Council need to address the parking and toilet facilities in the area, due to the existing PBA business. The present "portaloos" are smelly and revolting.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website - http://www.pembrokeshirecoast.org.uk/default.asp?PID=549

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 07 - Countryside
LDP Policy 08 - Special Qualities
LDP Policy 09 - Light Pollution
LDP Policy 11 - Protection of Biodiversity
LDP Policy 13 - Historic Landscapes Parks and Gardens
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 17 - Shore Based Facilities
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 31 - Minimising Waste
LDP Policy 32 - Surface Water Drainage
LDP Policy 33 - Renewable Energy
LDP Policy 34 - Flooding and Coastal Inundation
LDP Policy 35 - Visitor Economy
LDP Policy 43 - Protection of Employment Sites and Buildings
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW5 Chapter 03 - Making and Enforcing Planning Decisions

PPW5 Chapter 04 - Planning for Sustainability

PPW5 Chapter 05 - Conserving and Improving Natural Heritage and the Coast

PPW5 Chapter 06 - Conserving the Historic Environment

PPW5 Chapter 07 - Economic Development

PPW5 Chapter 08 - Transport

PPW5 Chapter 11 - Tourism, Sport and Recreation

PPW5 Chapter 12 - Infrastructure and Services

PPW5 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG05 - Sustainable Design

SPG06 - Landscape

SPG12 - Parking

SPG13 - Archaeology

SPG14 - Renewable Energy plus Addendum on Field Arrays

SPG16 - Regionally Important Geodiversity Sites

TAN 05 - Nature Conservation and Planning

TAN 06 - 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 16 - Sport, Recreation and Open Space

TAN 18 - Transport

TAN 21 - Waste

TAN 22 - Planning for Sustainable Buildings

Officer's Appraisal

Background

5.1 The proposed lifeboat station would lie to the south-east of the existing one, in a coastal inlet surrounded by steep cliffs at St Justinians. To the west is Ramsey Sound and beyond that Ramsey Island. Ramsey Sound is a north-south tidal sea passage separating the island from the mainland with a central, deep channel, strong tidal currents, and hazardous rocks. The coastline in the area is formed of indented rocky coves with high cliffs along the top of which runs the Coast Path. A single track dead-end road runs down to the coast to the north of the site, with two areas of parking located to the south of it. Behind the last area of parking to the south of the road is a gated access into a grass field that is currently used by the RNLI for crew parking. This field is

bounded by grass banks, beyond which to the west is the cliff slope and Coast Path. To the east is agricultural land and a static caravan park. The road terminates to the north-east of the existing offshore and inshore lifeboat stations, both of which are accessed by a flight of steps running down the cliff-side. To the south of these buildings is a further building owned by the RSPB. They also own the wooden shed at the top of the access stairs which appears to be used as an information centre. The area is a major centre for wildlife boat trip operators, along with water sports such as jet-skiind and kayaking, and coasteering.

Constraints

5.2 The site lies within the open countryside and is subject to numerous designations. It is located in a Historic Landscape. It is also within the St David's Special Area of Conservation (SAC), the Ramsey and St David's Peninsula Coast Special Protection Area (SPA), the Pembrokeshire Marine SAC, and the St David's Coast Peninsula Site of Special Scientific Interest (SSSI). The new lifeboat station is also within an area liable to flood as defined in Technical Advice Note 15, and the whole site lies within a Ministry of Defence Safeguarding Area. Three public rights of way, including the Coast Path, go through / bound the site. The existing lifeboat station is a Grade II Listed Building.

Relevant Planning History

5.3 There is an extensive pre-application history culminating in this application. The proposal as submitted has been established as needing an EIA which accompanied the application.

Current Proposal

5.4 The current application seeks full planning permission for the erection of a new offshore lifeboat station, cliff-top shelter, and car park at St Justinians. The new station is needed because the "Tamar" class of lifeboat coming into service with the RNLI is too large to be housed in the existing station. The RNLI are replacing their existing fleet of lifeboats (the "Tyne") with the "Tamar", which is bigger, faster and more able to improve research and rescue operations. In addition to housing the "Tamar", the new station would also allow the provision of improved and updated crew and search and rescue facilities. The use of the "Tamar" lifeboat is part of the RNLI's commitment to the UK Government (discussed further below) to improve search and rescue capabilities from St David's, which is a strategically important location for Search and Rescue (SAR) activities.

The development proposed is as follows:

- The new lifeboat station would be located in the coastal inlet to the south of the existing buildings. The rectangular shaped building would

be constructed of grey cladding under a curved natural copper roof, with hardwood windows and doors. It would be surrounded by a 1.5m wide walkway with galvanised guard rails, along with a launch deck facing out to sea (ie the west elevation) measuring approximately 10m x 5.5m. At its maximum extent the building itself would measure 15.3m x 28.8m x 9.5m. The building is two storey to accommodate the "Tamar" class lifeboat, which would be housed centrally within it, with all supporting facilities, rooms and stores surrounding it. A further smaller lifeboat would also be housed in the building to the rear of the launching apparatus. The "first floor" would also include a public viewing area. Both the building and the slipway would be supported on concrete pile supports. Access to it would be via a funicular way and steps from the cliff-top to the eastern elevation of the building. In addition to the emergency access required for the crew, the station would also be open for public access between 09.30 and 16.00 hours on a daily basis;

- The station's funicular access would terminate at the cliff-top, and would require the repositioning of the Coast Path. The existing graveled access track into the field used currently by the RNLI for parking would be extended and surfaced with a grassed soil reinforcement system. Six car parking bays including one disabled one would be provided, along with a turning and servicing area. This parking area would be for RNLI personnel. The rest of the field would remain as grassland; and

- A cliff top shelter, located to the north-western corner of the car-park field. This curved building would measure approximately 2.4m x 5.0m x 2.75m at its maximum extent and would be constructed of random rubble stone walling under a sloping concrete roof, covered with sedum. The building would provide a small seating and information area, along with housing for the station's electricity, waste, fuel and services.

- The station and car park would be drained using sustainable drainage and soakaways, with a septic tank or cess pit for the foul drainage.

The planning application has been supported with the following information:-

- Full design drawings of the proposed lifeboat station and its location
- A drawing showing the contractors compound and stores, the tower crane, and temporary footpath diversions;
- A drawing showing known land ownership;
- An archaeological geophysical report;
- A Design and Access Statement, and
- An Environmental Impact Statement

Environmental Impact Statement

5.5 In accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999, an Environmental Statement has been submitted. A scoping exercise was carried out with the Authority prior to the submission of the application and the following matters were agreed to be included in the EIA. The conclusions arising from each section are also summarized below:

- *Introduction* – this section explains why the new station is needed. Paragraph 1.2.3 states "The RNLI has a commitment to the UK government to maintain Search and Rescue (SAR) capabilities and has set targets of reaching 95% of casualties within 30 minutes of launch and reaching virtually any point within 50 miles of a station within 2.5 hours, in all weather conditions. To achieve these targets, Tyne class ALBs [all weather lifeboat] need to be replaced by Tamar class ALBs; a larger 25 knot lifeboat. However, the size of the Tamar class ALB is such that it cannot be accommodated in the existing lifeboat station at St David's."

- *A description of the proposed scheme*, proposed construction methodology, and consideration of alternatives. These were:-
  - The construction of a permanent berth to allow the boat to be permanently moored in the water. Although the Tamar lifeboat will be moored at sea whilst the construction work is underway, this does not provide a permanent solution as a sloped rock revetment would be required to allow access to the boat in bad weather. As this would have a larger footprint than the proposed building, it was considered unacceptable because of its increased environmental impact;
  - Construction on the existing site. This was discounted because it would involve the demolition of a listed building, and whilst it the work was occurring the RNLI would be unable to operate from the location, which is not acceptable due to the strategic role the site has;
  - Construction adjacent to the site. The new building could not be located to the north of the existing one because the water levels are insufficient plus the area is busily used by a number of other operators. Locating it to the south would intensify the visual impact of the development, plus duplicate means of access;
  - Do nothing. Although this would minimise the environmental impact of the scheme, it would prohibit the RNLI using the Tamar from the site. This is not acceptable in view of the RNLI's SAR targets;
  - The design of the station has been assessed and that proposed seeks to minimise the environmental footprint. The single piled foundation option was found to be the least environmentally harmful.

- The cliff top works were also assessed, and it was found that the option proposed minimised visual harm and minimised disturbance to the cliff-faces.

- *Relevant legislation*, including an assessment of the Local Development Plan policies relevant to the proposal.

- *The EIA Methodology.*

- *Coastal processes*. This section assessed the environmental impact of the construction and operation of the development on the hydraulic implications and consequential effects on coastal processes. The hydrodynamic regime has been ascertained as being the tides, currents and waves of the area, along with sediment and sedimentary movement. The EIA concludes that during construction there will be minimal hydrodynamic and sedimentary impact due to the mobility of the jack-up barge. Once operational the slipway could affect the hydrodynamic regime, but the change will be very localized. It was also anticipated that there would be a small amount of localized sediment accumulation or scour around the pilings. It was concluded that the potential risk of significant cumulative impacts arising from the development is unlikely;

- *Geology*. This section details the geological features and associated landforms of the cove. Ground investigation works confirmed that there are three main rock types at the site: siltstones, mudstones, and fine sandstones. The construction requires rock stabilisation and excavation, with approximately 43 cubic metres of rock to be removed. The stabilisation works will be through bolting and netting but will not result in a loss of rock. The overall impact during construction is therefore predicted to be of minor significance. Once operating the impact is assessed as being of negligible significance: although visually the rock face will be partially obscured, it will not impact on the coastal processes;

- *Water and sediment quality*. The water quality is excellent, with minimal pollution sources in the area. In terms of sediment quality, there is a mix of gravel, exposed bedrock, boulders and cobbles with some sand. During construction, pollution control processes will be in place, in accordance with Natural Resources Wales pollution prevention guidance. There will be some mobilisation of the finer sediment, but due to the coarse nature of most of the deposit, sediment mobilization and consequential impact on water quality is likely to be of negligible significance. During operation, the main pollution risk will be from accidental spills, and this risk will be similar to the existing lifeboat. Concern was also raised as to pollution from the car park, but the proposed surfacing of it with grasscrete will assist in the filtration of any pollution. As the anticipated use of the car park will not be heavy, pollution from it is considered to be low. As there are no other plans or projects in the area, cumulative impacts are not predicted.

- *Marine and coastal ecology.* The activities associated with the construction phase are likely to affect intertidal communities that surround the direct footprint of the development. The footprint of the station and its surrounding areas are colonised by communities typical of moderately exposed rocky shores, such as red algae, barnacles, and grazing invertebrates. It is anticipated that these colonies will re-establish once the disturbance is completed, and so the impact is predicted to be negligible. Minimisation of the works to subtidal habitats will be temporary due to the use of the jack-up barge, and any material that has to be moved will be replaced. There is high algal biodiversity in the area, but its recovery is anticipated because of the small areas affected over a short time. During operation, the station will provide new immobile habitat for colonization, although it is recognised that the short term loss of intertidal habitat and the alteration of habitats available for colonization will have a minor adverse significant impact at a local level.

- *Marine mammals.* The area is populated by grey seals, cetaceans, and otters. These species are sensitive to underwater noise, but this will be limited to localized, low source, low frequency noise, at limited time periods over a 12 week period. The avoidance of the use of percussive piling will also significantly limit high noise levels. The construction phase will therefore have a minor adverse significant impact at a national level. During operation, because the area is already busy with moorings and boat trips, it is not used by otters or grey seals, so there will be no impact on these species.

- *Terrestrial ecology.* This section of the EIA is concerned with the habitats and species that occur above the high tide line. The habitats affected by the proposal are scrub, maritime cliff vegetation, unimproved neutral grassland, tall ruderal vegetation, and amenity grassland. The species were invertebrates, reptiles and bats. During construction there would be a minor adverse impact of disturbance and loss of designated habitats, but it was a small area subject to a short-term impact. The construction compound will be located in a field that supports unimproved neutral grassland, and will be in place for 18 months. Given the short-term nature of the works and the existence of this habitat in the wider area it was felt that a minor adverse impact would occur. It would be mitigated by reinstating the grassland, thereby reducing the impact to a negligible residual one, including for invertebrates. A hand search for reptiles would occur prior to site works. There would be a permanent loss of the SSSI's scrub habitat on the cliffs, which is predicted to be a minor adverse impact of national significance.

- *Ornithology.* The area supports a number of bird communities, including a resident population of choughs, which represents 14% of the Pembrokeshire breeding population (ie 1% of the UK's). The contractor compound and works would result in a temporary loss of a

small area of foraging habitat, with the car park resulting in a loss of 450 square metres of habitat. However, the area is not used for foraging by the chough because it is not grazed. The loss of the habitat is considered of negligible significance at a local level. The works would also have a moderate adverse impact at a local level on nesting birds, although it was felt that due to the abundance of habitat this would have a negligible impact. During operation, the station would result in a permanent loss of habitat for feeding, breeding and roosting birds. The loss would be minor at a local level.

- *Commercial fisheries.* The most important fishery is potting, with activity peaking during the warmer months between April and November. The whole of Ramsey Sound is fished for crab, lobster and prawns. There is very little fishing in the vicinity of the existing or proposed slipways, and no activity on the construction site. Given the relatively low levels of fishing combined with the existing vessel activity from tourism, the disruption to the industry is considered to be negligible. During the station's operation, as its operation will be as per existing, further impacts on fishing are not anticipated. Although the relocation of current moorings will be needed, this is to be done in conjunction with the PBA.

- *Archaeology and Heritage.* In order to reduce any impacts to archaeological features, an archaeological watching brief is proposed to ensure that the appropriate mitigation measures are undertaken for both known and unknown features. The visual impacts of the construction works on the Historic Landscape and Listed Buildings are considered to be of minor adverse significance due to their short-term nature. During operation the impact will be minimised by the siting of the station and the use of materials, although it is acknowledged that there will be a permanent minor change to the Historic Landscape;

- *Tourism and Recreation.* The Coast Path runs around the cliffs, and is popular throughout the year, but particularly at week-ends, holidays and the summer months. The path will need re-routing during the construction works, but will be re-instated as close as possible to its original route on completion. Thus there will be a moderate adverse significance of for users during the construction phase. The area is also home to a number of firms catering for offshore tourist activities. The risk to kayakers and other marine users will be minimized. A number of safety measures will be undertaken during construction. Only a limited amount of users will be affected, so the proposal is not felt to have an impact.

- *Navigation.* There are approximately 19 private moorings available in the area, providing a range of services focused on the tourist industry, with peak provision between July and August. Existing boating activity is focused around the area of the existing slipway. A number of safety measures will be undertaken during construction, and several moorings will need to be relocated during the construction works, with 5

permanently re-located for the operation of the new station. As negotiations will be undertaken with the PBA to agree suitable locations for both the permanent and temporary moorings, the impact is considered to be negligible.

- *Traffic and Transportation.* During the construction phase there will be a requirement for construction vehicles, plant, personnel and materials to be delivered to site by road. The concrete will have to arrive by road as alternative methods of delivery are prohibitively expensive. The concrete delivery will take place over 5 or 6 days over a 12 to 16 week period, with up to 20 truck deliveries per day (approximately 6 vehicle movements per hour). As access to the site is via a single access road that serves as the only access to the area, this usage is likely to cause disruption to local traffic flows, and will result in moderate adverse significance. It is proposed to be mitigated for with a construction management plan, which will reduce the impact to minor adverse. During operation there will be no change over and above that which currently occurs.

- *Noise and Vibration.* On- and off-site construction noise and its impact on people has been assessed for the construction works, during both day and night, from works and associated traffic. The on-site construction noises were associated with the piling. In order to minimise its impact, percussive piling would not be used, and working hours would be daylight hours, with only minimimal night-time works dependent on tides. Noise mitigation measures would also be employed, such as using well-maintained machinery. Such measures would result in a temporary moderate adverse impact. Noise from the construction traffic would be minimised through control of hours, and was considered to have a negligible impact. As regards vibration, a method of piling would be used that has relatively low vibration levels, and the effect would not be felt at the nearest residential property. It was assessed that vibration from construction activities will have a negligible impact at the receptors.

- *Seascape, landscape and visual setting.* The three most prominent points of the proposal have been identified as:-
  - The top of the cliff-top building;
  - The roof of the seaward end of the main building; and
  - The bottom of the slipway at mean water level.

  It was considered that during the construction phase there would be a major adverse impact, but that following reinstatement it would moderate / minor. These effects would only last the duration of the construction (18 months), and that once the mitigation measures had established, such as reinstatement of grassland and grass banks, the major impact would be from the sea.

- *Implications for European Designated Status.* This section details the requirements of the Habitats Directive. It finds that the effect will be as follows on the European Designations:-

- St David's SAC – it will not have an adverse effect on the integrity of the SAC;
- Pembrokeshire Marine SAC – it will not have an adverse effect on the integrity of the SAC; and
- Ramsey and St David's Peninsula SPA – it will not have an adverse effect on the integrity of the SAC.

- *Water Framework Directive*. It was assessed that there would not be a permanent effect on the water body.

The summary of the potential impacts and mitigation measures extracted from the EIA are shown at Appendix A to this report.

Key Issues

5.6 The application raises the following planning matters:-

- Principle of the development;
- Impact on the special qualities of the National Park, and Historic Landscape;
- Impact on the economic vitality and viability of the area;
- Impact on the setting of the nearby Listed Buildings;
- Archaeological matters ;
- Protected species and habitat matters;
- Sustainable design;
- The water environment, flooding and drainage matters;
- Highways and rights of way matters;
- Privacy and amenity matters; and
- Ministry of Defence Safeguarding matters.

Principle of the Development

5.7 The site lies in a remote and iconic location in the open countryside and the area is a popular tourist destination. The need for a new lifeboat station has been the subject of pre-application discussions with the Authority for a number of years. The Authority has raised no objection to the principle of the new station, and has worked extensively with the RNLI as regards its design. It is now much smaller than originally proposed, and has been lowered so as not to project above the cliffs. The application now submitted by the RNLI and it's supporting EIA is on the basis of these discussions.

5.8 Clearly a proposal for a new lifeboat station needs a coastal location. Both national and local development plan policy (Policies 8 and 17 of the LDP) seek to protect undeveloped coastal locations, expecting that any such application demonstrates clearly why it is essential to have such a location. The supporting text to Policy 17 which seeks to protect the undeveloped coast accepts that there are possible exceptions including the construction of lifeboat stations. In addition Policies 8, 15,

29, and 30, in particular, seek to protect the special qualities of the National Park, including the pattern, diversity, and character of the landscape and villages, nature conservation habitats, and the historic environment. Development that is visually intrusive, that fails to incorporate traditional features and is insensitively sited in the landscape will not be supported.

5.9 Both the planning application and the EIA provide evidence as to the need for the station in this particular location. The need for a new station has been necessitated by the introduction of the new, larger, "Tamar" class lifeboats, which provide improved SAR capabilities, particularly in terms of distances, speed and capability and they can be used in all weathers. The St David's station covers an area of over 550 square miles, and is part of a network of stations around the coast. St David's covers a large area of offshore rocks and islands, with notorious tides. The RNLI has a commitment to the UK Government to maintain SAR capabilities (who in turn are required by international law to provide appropriate SAR facilities in their areas of jurisdiction). The location of the station at this particular point has been identified by the RNLI as being strategically essential in providing and maintaining the target of reaching 95% of casualties in all weathers within 30 minutes of launch. The introduction of the "Tamar" allows these targets to be achieved, but the boat is too big to be housed in the existing station. This and the need for associated facilities that meet employment and health and safety legislative requirements have resulted in the need for a new station. An operational statement provided by the RNLI is attached at Appendix B.

5.10 With regard to the above policy context, schemes of this importance have to demonstrate that new buildings are the only option, and that all other opportunities have been investigated. The national need for the proposal has been explained in the application and the EIA provides information on the other alternatives and how they are unable to address the RNLIs current requirements. These options have been discussed in the EIA summary above where it demonstrates that the only suitable location for the station is as submitted. The need for the new station has not been in dispute at the pre-application stage, and it is felt that the proposed location has been justified over those alternative sites specified by the EIA. Both the planning application and the EIA refer to the strategic need to provide coverage from the St David's vicinity, and how this site forms part of a larger coverage web along the coast. The proposed building provides the functional requirements for the boat in terms of launching into the sea. In addition it utilises existing car parking areas. An important consideration is that this is a particularly remote stretch of coast and the provision of a new station anywhere other than as proposed would be significantly more harmful to the environment, including in terms of required ancillary uses such as road and service infrastructure. If the new station is not constructed the RNLI cannot meet the SAR standards that it has undertaken to the UK Government to provide. Consequently is

considered that there is a national need for the station, and that its proposed location is justified.

Impact on the Special Qualities of the National Park and Historic Landscape:

5.11 Notwithstanding the justification for the proposed station as discussed above, national and local policy also makes it clear that any such scheme should not have a detrimental effect on the environment and the landscape, and if it does, can be mitigated against or moderated. Policies 8, 15, 17, 29, and 30, in particular, seek to protect the special qualities of the National Park, including the pattern, diversity, and character of the landscape and undeveloped coast, its sense of remoteness and tranquility, its nature conservation habitats, and the historic environment. Development that is visually intrusive, that is insensitively and unsympathetically sited within the landscape, that fails to incorporate traditional features, that intensifies or introduces an incompatible use and that fails to harmonise with or enhance the landform and landscape character will not be supported.

5.12 As already noted, the siting and design of the station has been the subject of lengthy pre-application discussions. Key considerations that the RNLI have addressed have been to reduce the size of the station to its proposed functional minimum, and to reduce its height so that it does not break the cliff-line. The current submission has addressed these requirements, thereby minimising the station's visual impact when viewed from the surrounding landscape and seascape. Its location within a steeply cliffed inlet also partially screens it from wider views, both on and off-shore. The application has been supported with photographic evidence that demonstrates that whilst this is a large structure, it is viewed against the imposing grandeur of the cliffs, and that it does not result in significant visual intrusion.

5.13 The proposed materials for the station are grey cladded walls under a curved copper roof that was to have a pre-patinated brown finish. These materials and colours have been chosen so as to harmonise with the natural colours of its setting, and were the subject of lengthy discussions with the Authority to achieve a scheme that was acceptable. In addition, none of the proposed materials is shiny or reflective, including security fencing and balustrading. Discussions have been held with the RNLI with regard to the possible use of timber cladding (as at Tenby) but a verbal response was given that there was initial concern as it would require frequent maintenance and repair. It is accepted that in this an exceptionally exposed location and the salt laden atmosphere, the use of timber could be prohibitively expensive and impractical and the proposed materials are not considered to result in an excessively intrusive visual building that is harmful to the special qualities of the National Park.Subject to standard conditions for the approval of samples of the actual materials to be used, no objection is raised to the lifeboat station building itself.

5.14 There has also been discussion regarding the possibility of sinking the cliff-top building down into the landscape so as to minimise its visual impact. The cliff-top building is a multi-purpose structure providing a small information area, and enclosed areas for fuel, the electricity supply and services to the station. It would be located to the north of the funicular access, in the westernmost corner of the car parking field, and would be partially screened by the retention of the existing grass banks that bound the site. The RNLI's agents have considered a more sunken option, but are of the view that this will result in significant excavation and disturbance to the cliff top and affect the access required for the building. It is also considered that retaining walls and guarding would be required and this should be kept to a minimum. It is the RNLI's agent's view therefore that there would be a greater visual impact arising from this alternative than that proposed. It is your officers' view that on balance, the use of natural materials and a sedum roof, plus its location serve to minimise its visual impact in the landscape, and subject to conditions, including the retention of the grassbanks, no objection is raised to the proposal.

5.15 The proposed car park formalises the RNLI's existing use of the field, providing 6 spaces for RNLI personnel, along with associated turning and emergency access. The parking seeks to harmonise with the existing land levels, and proposes a grass re-inforcement surface. The drawings show a fence defining the car park from the remainder of the field, but the RNLI have verbally agreed to provide a hedgebank instead, so as to further screen the proposal from wider views. In view of these measures, plus the existing use of the field for parking, the proposal is not felt to unduly harm the special qualities of the National Park, subject to conditions controlling landscaping details. It is also considered that the car park should be used solely for lifeboat personnel only so as to control the level of public parking in the area and this can be the subject of a condition.

5.16 Policy 9 of the Local Development Plan states that proposals that are likely to result in a significant level of lighting will only be permitted where it relates to ia proposal's purpose, and where there is not a significant adverse effect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky. The station's slipway and launching areas would be floodlit when in use, with low intensity lighting on passive infra red (PIR) sensors to access ways and the perimeter of the building. The building has also been designed so as not to have large windows in order to minimise light trespass. This level of lighting is essential for the safe operation of the station, but notwithstanding this requirement a condition is suggested controlling internal and external lighting so as to minimise light trespass in this remote location.

Impact on the Economic Vitality and Viability of the Area:

5.17 Policy 1 of the Local Development Plan states that development within the National Park must be compatible with the conservation or enhancement of its natural beauty, wildlife and cultural heritage, and the public understanding and enjoyment of these qualities. In determining proposals, due regard will be paid to the need to foster the economic and social well-being of the local communities provided this is compatible with statutory National Park purposes embodied in the foregoing considerations. Where there is a conflict between these purposes, greater weight has to be given to the conservation and protection of the natural beauty. A number of objections have been received from the local community, particularly those businesses operating from the existing lifeboat station. They are very concerned that the new station will destroy their businesses, resulting in a loss of employment and revenue to the area. Several also object to the exclusion of the existing life-boat house from the application, and the lack of provision of further public car parking and visitor facilities. Comments have also been made that the RNLI has not consulted local businesses about their proposals or sought to address their concerns.

5.18 The RNLI have not included the existing station within the current application: consequently what happens to it is not a matter for consideration with this application. The continuation of the existing uses from it are a matter between the building's owner and those that currently use it and are not material planning considerations. Nor can this application be used as a vehicle for achieving more public facilities for the area: if these are required then it is up to the relevant organisations to apply for them. Consequently, the current application cannot be refused because it does not include the existing station, or additional public parking and facilities. The application does require the relocation of 5 moorings to accommodate the new station, and the EIA makes it clear that this will be done in consultation with the relevant parties. The EIA also refers to the impact of the construction work on the commercial vessel operators and fishing boats that use the cove and the existing, determining that it will be negligible, a view which is concurred with.

5.19 In addition, several objectors have stated that the construction works will result in permanent damage to their tourism businesses particularly whilst the station is being constructed. Again the EIA explains at great length the measures that will undertaken to minimise disturbance to the area, such as the use of particular piling techniques to reduce disturbance, and the adoption of a transport management system for deliveries, etc. The RNLI state in their Environmental Statement that they have undertaken community consultation concerning the application, have proposed meetings with local businesses in the EIA to sort out issues such as moorings, plus they are attending the City

Council's Working Group that has been set up to discuss the St Justinian's area.

5.20 The highways section of this report below refers to the measures needed as regards minimising the impact of construction traffic in the area. As such, whilst the concerns regarding these matters are noted, they are not material to the consideration of the application except where the construction phase may impact on existing businesses, and your officers are satisfied that these matters can be appropriately addressed through conditions requiring the identified measures to be undertaken during the construction phase.

Impact on the Setting of the Nearby Listed Buildings:

5.21 The existing and old lifeboat stations are Grade II Listed Buildings, whilst the ruins of St Justinian's Chapel are Grade I, and the well and watch tower are Grade II. There is a statutory duty to consider the impact of the application on their settings, particularly the lifeboat stations on which the new one would have the greatest impact. Policy 8 of the Local Development Plan, in addition to other issues, seeks to protect the historic environment. In terms of architectural form and detail the existing lifeboat station has a distinct character, designed specifically for a special function as opposed to having a typical local vernacular. The Authority's Conservation Officer has raised no objection to the proposed development. Although it is acknowledged that the proposed building has a major impact on the setting of the existing and old stations, the context here is unusual and specialised in that the building is compatible in form and function to the existing ones, and continues the hierarchy manifest in the juxtaposition of the 1869 and 1911 stations. The impact of the new station is a major but acceptable and justified one, and the proposal is not felt to harm the setting of either these Listed Buildings or the others in the vicinity.

Archaeological Matters:

5.21 Policy 8 of the Local Development Plan seeks to protect the special qualities of the National Park, including amongst other things, the protection and enhancement where possible of the historic landscape. The impact of the proposal on the Historic Landscape has been discussed above. In addition the area is rich in buried archaeology. As well as the information provided in the EIA, the application was also supported with an archaeological geophysical survey. It was found that despite an absence of clearly identifiable below ground features, the potential for surviving archaeology still exists on site. The Dyfed Archaeological Trust (DAT) agree with these findings, and require a "Grampian" condition requiring the implementation of a programme of archaeological work in accordance with a written scheme of investigation. The scheme should include details of how archaeological interests are to be protected, the production of a report

of the results of the work, monitoring arrangements, and contingency arrangements in the event of an unexpected discovery.

Protected Species and Habitat Matters:

5.22 The application lies within the St David's Special Area of Conservation (SAC), the Ramsey and St David's Peninsula Coast Special Protection Area (SPA), the Pembrokeshire Marine SAC, and the St David's Coast Peninsula Site of Special Scientific Interest (SSSI). Policy 8 of the Local Development Plan seeks to protect the special qualities of the National Park, including amongst other things, the restoration and enhancement of the National Park's ecosystems. Policy 9 seeks to minimise light pollution. Policy 11 states that development that would disturb or otherwise harm protected species or their habitats will only be permitted where the effects can be acceptably minimised or mitigated. The EIA has detailed the impact and proposed mitigation measures that the scheme requires to ensure that these designations do not lose their integrity.

5.23 Due to the site being within European Designations, the application has to be tested for Likely Significant Effects (LSE) in accordance with the requirements of Regulation 61 of the Conservation of Habitats and Species Regulations 2010. This is a role undertaken by the Authority's Ecologist who has determined in this instance that the proposal has no Likely Significant Effect on the Ramsey and St David's Peninsula Coast SPA or the St David's SAC. However because it results in the permanent loss of part of the reef which is a feature of the Pembrokeshire Marine SAC, this has been assessed as having a Likely Significant Effect and therefore has to be subject to an Appropriate Assessment (AA). NRW has confirmed the findings of the Authority's Ecologist on this matter. The Appropriate Assessment that has been carried out has concluded that "the project would result in Adverse Impact on the *reef* feature of the Pembrokeshire Marine SAC".

The Implications of Adverse Impacts on a SAC

5.24 The legislation surrounding the Habitats Directive is complex and is supported by a number of policy and advice documents both at Europena and national level. Of particular note is TAN 5 – Nature Conservation and Planning and the Guidance on Article 6(4) of the Habitats Directive 92/43/EEC "Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission" ("the 2007 guidance"). The Appropriate Assessment considers the requirements for the features of the SAC to be at Favourable Conservation Status (FCS) and considers range, including distribution and extent, structure and function, typical species, and natural processes. The AA concluded that the permanent loss of intertidal reef (albeit of some 25 square metres only) as a result of the piling for the lifeboat station would constitute adverse impact on the

structure and function of the reef feature. As such it would undermine the FCS of the feature and hence the conservation objectives for it. The AA concluded that no adverse effect would result to typical species or natural processes. No mitigation or compensation for the loss was offered by RNLI as part of the project at the time of the AA.

5.25 Since the AA conclusions were reached, discussions have been ongoing with the applicant's agent and NRW. The advice from NRW is that mitigation cannot be offered in this case as the impact here is the loss of the reef under the pilings. Mitigation is action that **AVOIDS** the impact (i.e stops it from happening in the first place). Mitigation for the slipway and lifeboat station cannot be achieved as they need to be on a number of pilings that will cover and remove an area of reef, and which no amount of habitat creation can actually avoid.

5.26 In such cases, it would be normal practice to refuse the application on the impact of the development on the FCS of the features of the SAC. The only exception to this under the Habitats Regulations would be where there are Imperative Reasons of Overriding Public Interest "(IROPI") for allowing the development and where compensatory measures are offered. Should it be considered that there is a case of IROPI and satisfactory compensation measures are offered and so that the development is deemed acceptable by the Local Planning Authority they must refer that decision to the Welsh Government. The referral gives 21 days for the Welsh Government to advise whether it wishes to make the decision itself or to allow the LPA to proceed to determination. This is a similar process to that under the "call in" procedure.

5.27 In considering whether a project can be approved on the basis of IROPI, consideration can given to a number of considerations including human health and safety and reasons (in the case of reefs and because reefs are not a European priority habitat identified in Annexe 1 of the Habitats Directive) of a social or economic character. In considering IROPI TAN 5 cautions, "When considering cases against these principles, in general, projects of national importance are most likely to be judged as giving rise to imperative reasons of overriding public interest. Important regional projects might also be so judged. Whilst projects of a more local significance cannot be ruled out, it is less likely that their potential benefits will be considered to override harms to the nature conservation value of the site".

5.28 Paragraphs 5.9 and 5.10 of this report discuss the national need for this development with regard to the statements made by the RNLI in its original application and the further details provided and attached at Appendix B. It is considered that the proposal clearly forms part of an international framework to provide SAR facilities that is implemented by the national government through the RNLI's "Concept of Operations" given to the UK government and the commitments therein. Furthermore, it is considered that alternative options have been fully

explored and it has been demonstrated that there is no other feasible option to the location of a new lifeboat station at St Justinians to either accommodate the larger "Tamar" class vessel or provide an alternative SAR facility. There is a clear need for this facility to be in this location due to its strategic location between Fishguard and Angle lifeboat stations and to enable the RNLI to meet its commitments given to the UK government with regard to response times and distances. Therefore, whilst the proposal is mainly for a local interest, it is part of a national commitment to the UK government for SAR in the overriding interests of human health and safety. It is also considered that there are no other alternatives to the proposal that could be carried out without adverse effect to the features of the SAC. As such it is your officers view that this proposal can be justified in terms of IROPI.

5.29 Following the conclusions of the AA the applicants have also been discussing the compensatory measures that could be offered. These discussions have centred on the re-use of the excavated rock arising from the project to provide additional rock surface within the planning application boundary by placing the rocks on the seabed adjacent to the piles to provide the base for the creation of further reef in a similar location to that lost. The area has been calculated as a $17m^2$ area lost, and $22m^2$ is proposed. Further documents and plans have now been received in this respect. It is NRW's initial view that this habitat creation would compensate for the loss, and artificial reef creation would be satisfactory compensatory habitat for an IROPI case.

5.30 At the time of writing this report, a further AA has not been carried out with regard to the compensatory measures offered, and as such a further verbal report will be given at the meeting. However, it is considered that subject to the AA confirming that the compensation is acceptable, that a case to support this development can be made on IROPI.

Sustainable Design:

5.31 Both national and local Development Plan Policy requires sustainable design. Policy 29 of the Local Development Plan expects all proposals for development to demonstrate an integrated approach to design and construction, whilst Policy 32 requires sustainable drainage systems for the disposal of surface water. Policy 31 requires the minimisation of waste, requiring development to minimise, re-use and recycle waste generated through demolition and construction. The station would be mostly unheated, with the full external elevations insulated to minimise condensation. The heating for the changing areas, crew and operations rooms would be from a sea water sourced ground source heat recovery variant, utilizing either the steel piles or the slipway as a conduit. All lighting will be on PIR sensors, with low intensity lighting to access ways and the perimeter of the building, and the deck and slipway being floodlit during use only. The copper roof is estimated to have a lifespan of 700 years and is fully recyclable. Waste from the

site will be stored in the cliff-top shelter prior to disposal. The sustainability of the building and its proposed operation is therefore considered acceptable pursuant to national and local development plan policies.

The Water Environment, Flooding and Drainage Matters:

5.32 Policy 32 of the Local Development Plan requires new development to incorporate sustainable drainage systems for the disposal of water on site. Policy 34 of the Local Development Plan requires development to be directed away from those areas which are at risk of flooding now or as predicted unless there are sound social or economic justifications in accordance with Technical Advice Note 15. The application proposes the use of a septic tank or cess pit for foul drainage, with surface water being discharged via soakways and sustainable drainage systems. The Environment Agency (now part of Natural Resources Wales) was consulted, and has raised no objection to the proposal. The use of sustainable drainage systems to drain the car park is supported as it is considered to reduce the risk of flooding and protect water quality. As regards the proposed foul drainage arrangements, NRW prefer the use of a septic tank to a cess pit as they are only allowed in exceptional circumstances. In this instance they have required a condition requiring the scheme for foul drainage to be approved prior to commencement. They have also requested bunding for the fuel tank, which can be a conditional requirement, and do not consider the proposal will have a harmful impact on fisheries. They do require the mitigation measures for biodiversity to be included as a conditional requirement within any permission.

5.33 Welsh Water was also consulted on the application and has raised no objection to the proposal subject to Natural Resources Wales being satisfied that the use of a septic tank or cess pit is acceptable.

Highways and Rights of Way Matters:

5.34 Policies 52 and 53 of the Local Development Plan refer to the traffic impacts of proposed development, and seek to improve and promote accessibility for all types of users and reduce the need to travel by car. The Highways Authority at the County Council has been consulted on the application and it has considered its impact in terms of both its operation and construction phase. Dealing with the operational matters of the new station first, the Authority has raised no objection to its use. The public highway is sufficient for current and future use of the lifeboat station. It is felt that the dedicated parking area proposed solely for crew use is an improvement over the existing arrangements and will improve the operation of the station.

5.35 The main issue with the proposal is the construction phase. The lane leading to St Justinians is primarily single track with few passing places and is well used during peak seasons. The risk of conflict during the

construction period is high and therefore needs to be controlled to minimise and manage risk. In order to achieve this the Highways Authority requires a Construction Management Plan to be completed and agreed prior to the commencement of works. As this is proposed in the application and EIA, the applicant has raised no objection to this requirement. The Highways Authority has detailed the measures that need addressing: the Plan should reflect the substantially single nature track of the access road, its high level of use at certain times of year, and how the impact of delivery and construction traffic can be controlled to minimise the impact of construction traffic on the road. Potential controls could include traffic controls along the approach road during deliveries, the avoidance of substantial deliveries at peak times, the use of buses and car sharing for workers, and the use of a compound near the site to avoid the off-loading of vehicles adjacent to the site. Subject to the production of the plan, and the provision of the proposed car park prior the use of the station, no objection has been raised to the proposal.

5.36 There are three public rights of way that are affected by the proposal, one of which is the Coast Path. The Park Authority's Rights of Way Section has advised that there will need to be temporary and permanent alterations to the line of the Coast Path. The Section has requested that detailed plans of the proposal and how it affects the paths is needed. This information can be conditioned as being provided prior to the commencement of any development on the site to ensure that the appropriate diversions and protection measures are put into place, and if needs, be incorporated into the final scheme.

Privacy and Amenity Matters:

5.37 Policy 30 of the Local Development Plan refers to amenity in a general sense, seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties. Objection has been raised by several businesses and neighbours as to the potential for nuisance to be experienced during the construction of the site. The matters of light pollution and traffic management have been discussed above, but the application also raises noise and nuisance concerns. The application and EIA propose a number of mitigation measures, and in particular would use a type of piling that minimizes noise and vibration. In view of the noise and nuisance concerns raised by the application, the views of the Public Protection Section at the County Council have been sought. It is their view that the most significant source of noise during the construction phase of development will be that associated with the installation of the piles, particularly if this occurs at night. The applicant has stated that they will not be using percussive piling, and will only work at night in exceptional circumstances that will be governed by the tide. Night-time working will only then occur in consultation with the neighbouring properties and the Planning Authority. The Section feels that standard control noise measures will need to be implemented. As regards the

vibration caused by the piling, it is felt that as percussive piling is not used, that this together with the separation distances between the works and neighbouring properties is sufficient so that ground-borne vibration will not be perceptible at the receptors. In order to minimise the nuisance resulting from the construction works, the Section have suggested a number of conditions are attached to any permission. These are hours of works, notification of any night-time working, and the implementation of good site practices which can be included in any consent.

Ministry of Defence Safeguarding Matters:

5.38 The site lies within a Ministry of Defence Safeguarding Zone, and the MoD has been consulted to ascertain their views of the proposal. They have raised no objections to the proposal.

Conclusion

This is a full planning application with an accompanying EIA for a new lifeboat station, associated cliff top shelter, vehicular access and car park, at St David's Lifeboat Station, St Justinian's. It is considered that it has been demonstrated that the proposal meets and imperative national need and the location of the lifeboat station has been fully demonstrated as the best option to meet the RNLI's commitments to the UK government in providing a SAR service. The boathouse is an integral part of the facilities required to undertake this service.

It is also considered that the development does not result in significant harm to the environment that would justify its refusal and is an acceptable scheme in design terms, with regard to the special qualities of the landscape and historic buildings and archaeology, and with regard to highways matters, privacy and amenity, the water environment and drainage, and economic issues.

However, it is considered that the proposal would have adverse effects on the reef feature of the SAC and as such the development should only be permitted where it can be demonstrated that there are imperative reasons of overriding public interest that justify the development and that adequate compensatory measures are put in place in respect of the lost reef.

In this respect a further Appropriate Assessment will be carried out with the recently submitted compensation measures taken into account. Subject to the findings of the Appropriate Assessment concluding that the compensation measures offered are sufficient for the loss of the reef feature it is considered that the application should be referred to the Welsh Government with a recommendation of approval on IROPI grounds.

Recommendation

That subject to a further Appropriate Assessment concluding that the compensation measures offered are sufficient for the loss of the reef feature that the application be referred to the Welsh Government with a recommendation that planning permission should be granted notwithstanding the adverse effects on the Pembrokeshire Marine European Site SAC on the grounds of imperative Reasons of Public Interest related to the protection of human health and safety..

Should the Welsh Government not wish to determine the application it is also recommended that authority be given for the Head of Development Management to issue planning permission subject to conditions.

19 SUMMARY OF POTENTIAL IMPACTS AND MITIGATION MEASURES

19.1 Introduction

19.1.1 **Table 19.1** provides an overall summary of the findings of the ES and lists the potential environmental impacts that are predicted to arise during the construction and operational phases of the proposed development. The significance each of the potential impacts is situated, along with any mitigation measures that are recommended to reduce or avoid adverse impacts. The residual impact (i.e. the significance of the potential impact remaining following mitigation) is also stated.

Table 19.1: Summary of Potential Impacts, Impact Significance, Mitigation Measures and Residual Impacts

Impact	Significance	Mitigation	Residual Impact
Physical Environment - Coastal Processes			
Construction			
Alteration of Hydrodynamic/sedimentary Parameters	Overall, it is considered that the works undertaken during the construction phase will not significantly alter the sedimentary regime or the waves / tidal regime, with any potential changes being limited in scale and duration	None required	N/A
Operation			
Alteration of Hydrodynamic/sedimentary Processes	Due to the small size of the development in relation to the elements that will be located below mean low water springs, changes to hydrodynamic and sedimentary processes are only predicted to be very localised	None required	N/A
Geology			
Construction			
Access to the geological site	Access is already restricted due to steep cliffs surrounding the cove, and the geological site can only be accessed at low water from Porthstinian Cove Construction works will further restrict access, however there are similar accessible deposits nearby, therefore the impact is predicted to be of minor adverse significance	None required	Minor adverse
Loss of geological feature / resource	The option will involve removal of 45m^3 of material There are however similar rock formations within the area, and the volume of removal is considered relatively small, therefore the impact is predicted to be of minor adverse significance	Cliff disturbance has been reduced as far as possible within the design, therefore further mitigation is not possible	Minor adverse
Operation			
Access to geological site	Access to the geological site is currently restricted by the steep cliffs and state of the tide This will not change	None required	Negligible

Impact	Significance	Mitigation	Residual Impact
	during the operational phase. Negligible impact is therefore predicted		
Obstruction to geological feature and alteration to geological processes	The existence of the lifeboat station will obscure a small amount of geological feature, however the impact is predicted to be of minor adverse significance due to the size of the site and local areas exhibiting similar geological features	Cliff disturbance has been reduced as far as possible within the design, therefore further mitigation is not possible	Minor adverse
Water and Sediment Quality			
Construction			
Accidental Spills of Contaminants	Low risk as a result of control measures to be put in place	N/A	N/A
Mobilisation of Fine Sediment, Nutrients and Contaminants (Sea-based Construction)	Due to the coarse nature of the substrate, significant re-suspension associated with the works is not anticipated An impact of negligible significance is therefore predicted	None required	Negligible
Mobilisation of Fine Sediment, Nutrients and Contaminants (Land-based Construction)	The majority of works will be undertaken within the cove where terrestrial soils are not present. Control activities will be put in place to ensure potential for run-off from the cliff face is managed. The risk of mobilisation of these parameters is therefore deemed to be low	N/A	N/A
Operation			
Accidental Spills of Contaminants	Low risk as a result of control measures to be put in place	N/A	N/A
Wastewater Discharge	No impact is predicted as all flows will be collected and pumped to a septic tank at the top of the cliff	None required	No impact
Marine and Coastal Ecology			
Construction			

Impact	Significance	Mitigation	Residual Impact
Disturbance and Loss of Intertidal Habitat	Since the habitat to be disturbed by the construction does not contain any species of particularly importance and that the habitat will only be temporarily disturbed, an impact of negligible significance is predicted	None required	Negligible
Disturbance and Loss of Subtidal Habitats	Due to the temporary nature of the disturbance and likely recovery of the area, the impact is predicted to be of negligible significance	The working footprint will be reduced as far as possible	Negligible
Effects through Deterioration of Water Quality	Since very minimal impacts are predicted on water quality during the construction phase the impact is predicted to be of negligible significance	None required	Negligible
Effects through Accidental Spills	Low risk as a result of control measures to be put in place and therefore impacts on marine ecology are not predicted	N/A	N/A
Operation			
Loss of Intertidal Habitats	A small area will be permanently lost as a result of the development but this area is not deemed to support particular habitats of interest. As a result, a negligible impact is predicted	N/A	Negligible
Loss of Subtidal Habitat	A small area will be permanently lost as a result of the development but this area is not deemed to support particular habitats of interest. As a result, a minor adverse impact is predicted	N/A	Minor adverse
Effects from Accidental Spills	Low risk as a result of control measures to be put in place and therefore impacts on marine ecology are not predicted	N/A	N/A
Effects from Alterations to Coastal Processes	The scheme is only likely to result in localised, small changes to wave energy and currents around the piles of the slipway and therefore no impact is predicted	N/A	No impact

Impact	Significance	Mitigation	Residual Impact
Marine Mammals			
Construction			
Disturbance through noise and vibration	Due to the nature of the proposals and the chosen method for piling, the impacts on marine mammals due to noise are predicted to be of minor adverse significance	None required	Minor adverse
Collision risk due to increased vessel numbers	Due to the slow moving nature of the main vessel to be present in the cove, the risk of collision is deemed to be low	Vessels travelling to the site should use caution and travel at minimum safe navigable speeds only, in line with the Pembrokeshire Marine Code of Conduct	N/A
Operation			
Loss of feeding and hauling out areas	The cove is not considered likely to be important or suitable for significant otter feeding or seal hauling out / pupping. As such, no impact on otter feeding areas or seal haul out areas are predicted.	None required	No impact
Terrestrial Ecology			
Construction			
Disturbance and loss of designated habitats	Since only short term habitat loss is predicted as a result of vegetation re-establishing itself over time, an impact of minor adverse significance is predicted	None required	Minor adverse
Disturbance and loss of non-designated habitats	Since only short term habitat loss is predicted as a result of vegetation re-establishing itself over time, an impact of minor adverse significance is predicted	Delineation of working areas (to include access routes) to avoid accidental damage to habitats. Requirement to re-instate neutral grassland habitats disturbed during construction.	Negligible
Disturbance to reptiles	A temporary disturbance to reptile habitat is predicted as a result of the vegetation clearance and works associated with the new station. An impact of minor adverse impact	Requirement to carry out a hand search prior to vegetation clearance. Should any reptiles be located, these will be	Negligible

Impact	Significance	Mitigation	Residual Impact
	is predicted.	relocated to suitable habitat close by. Additionally a tool box talk is to be provided to all site personnel.	
Disturbance to invertebrates	Due to the small and temporary nature of the disturbance and lack of optimal habitat in the proposed development site, an impact of negligible significance is predicted.	Requirement to re-instate neutral grassland habitats disturbed during construction. Since scrub habitats are expected to recover naturally, mitigation for this type of habitat is not proposed.	Negligible
Operation			
Permanent habitat loss – designated sites	No impact is predicted on the scrub habitat due to shading and an impact of minor adverse significance is predicted in relation to the loss of the scrub habitat on the cliffs.	None required.	Minor adverse
Permanent habitat loss – non-designated sites	A 10% loss of field habitat is predicted which is deemed to be of negligible significance.	Seeding of grasscrete (using the same species as that already found at the site) and planting schedules agreed with the regulatory authorities.	Negligible
Permanent impacts to protected species	The use of the field for parking will not differ from the current situation; there will therefore be no impact to reptiles or invertebrates as a result of the operation of the lifeboat station.	None required.	No impact.
Ornithology			
Construction			
Direct impacts to foraging birds in grassland from habitat loss	Since only short term habitat loss is predicted as a result of vegetation re-establishing itself over time and the species of birds using the site are common to the area, an impact of negligible significance is predicted.	None required.	Negligible
Indirect impacts to foraging birds in grassland and cliff edge from disturbance	Due to the temporary nature of the disturbance and availability of alternative habitat close by, an impact of negligible significance is predicted.	None required.	Negligible

Impact	Significance	Mitigation	Residual Impact
Direct impacts to breeding birds in the grassland from habitat loss	Since there is the possibility that birds could be breeding at the site to be disturbed, an impact of moderate adverse significant is predicted.	In order to reduce the potential impact as far as possible it is recommended that clearance of vegetation is undertaken outside of the breeding season. If this is not possible then it is recommended that a suitably qualified ecologist should be present to check areas of vegetation prior to the works. If nests are found vegetation should be marked out to create a buffer zone around the nest. Clearance should not be made until the chicks have fledged.	Negligible
Disturbance to breeding birds (cliff face)	There is the possibility that breeding birds could be using the cliff as the vegetation is suitable and therefore a moderate adverse impact is predicted as a worst case.	It is recommended that a form of prevention of nesting is put in place before the breeding season and before any works commence.	Negligible
Operation			
Loss of foraging and breeding habitat	Since the site does not support any species of particular conservation value and the small loss of habitat as a result of the structures to be installed and the probability of much of the area disturbed will recovered, an impact of minor adverse effect is predicted.	Re-instatement of the construction compound is recommended and re-seeded in consultation with PCNPA and CCW. Consequently, the area lost will significantly reduce.	Negligible
Commercial Fisheries			
Construction			
Obstruction and disruption to fishing activity	Since the fishing activity in the local area of the development is limited to potting activity and the short term nature of the construction phase / static positioning of the jack-up barge, an impact of negligible significance is predicted.	Control measures will be put in place to ensure the safety of mariners such as issuing of Notices to Mariners and discussions with statutory bodies to ensure any risks are minimised as far as possible.	Negligible

Impact	Significance	Mitigation	Residual Impact
Indirect impacts through deterioration in water quality	Since control measures will be put in place in order to control any potentially contaminated discharges, minimal risk associated with accidental spillage is anticipated. In terms of other water quality impacts, the coarse nature of the sediments, significant levels of contamination are not anticipated and therefore the risk to commercial fisheries is deemed to be of negligible significance.	Not required	Negligible
Impact of construction noise	Noise levels will be low, localised and of limited duration. As such, an impact of negligible significance is predicted.	Not required	Negligible
Operation			
Disturbance to commercial fishing	The lifeboat station's operational procedures will remain the same as the current stations activities, no impacts on commercial fishing activity of fisheries resources are anticipated as a result of the operational activities.	Not required.	No impact
Potential obstruction to commercial fishing	The relocation of the current moorings could, depending on the new location, effect fisheries through the loss of potential potting ground. It is likely the new location would be planned through consultation with local stakeholders and as such the impacts to fishing grounds are likely to be limited and are considered to be of negligible significance.	None required.	Negligible
Archaeology and Heritage			
Construction			
Disturbance and damage to known features	Widening of the access to the RNLI's field and access for the diverted footpath, could damage and undermine the stability of the field wall resulting in a minor adverse impact to archaeological interests as a result of the works. It is anticipated that vibration associated with the works will have no impact on archaeological resources in the area.	If the widened access and diverted footpath are to be used purely during the construction phase, it is recommended that the stone wall is re-instated following completion of the works. Repairs to the structure should be undertaken using similar materials to the existing structure (drystone and turf).	Negligible

Impact	Significance	Mitigation	Residual Impact
Direct impacts to breeding birds in the grassland from habitat loss	Since there is the possibility that birds could be breeding at the site to be disturbed, an impact of moderate adverse significant is predicted	In order to reduce the potential impact as far as possible it is recommended that clearance of vegetation is undertaken outside of the breeding season If this is not possible then it is recommended that a suitably qualified ecologist should be present to check areas of vegetation prior to the works If nests are found vegetation should be marked out to create a buffer zone around the nest Clearance should not be made until the chicks have fledged	Negligible
Disturbance to breeding birds (cliff face)	There is the possibility that breeding birds could be using the cliff as the vegetation is suitable and therefore a moderate adverse impact is predicted as a worst case	It is recommended that a form of prevention of nesting is put in place before the breeding season and before any works commence	Negligible
Operation			
Loss of foraging and breeding habitat	Since the site does not support any species of particular conservation value and the small loss of habitat as a result of the structures to be installed and the probability of much of the area disturbed will recovered, an impact of minor adverse effect is predicted	Re-instatement of the construction compound is recommended and re-seeded in consultation with PCNPA and CCW Consequently, the area lost will significantly reduce	Negligible
Commercial Fisheries			
Construction			
Obstruction and disruption to fishing activity	Since the fishing activity in the local area of the development is limited to potting activity and the short term nature of the construction phase / static positioning of the jack-up barge, an impact of negligible significance is predicted	Control measures will be put in place to ensure the safety of mariners such as issuing of Notices to Mariners and discussions with statutory bodies to ensure any risks are minimised as far as possible	Negligible

Impact	Significance	Mitigation	Residual Impact
Disturbance and damage to unknown archaeological features	The cove at Penrhyn and the RNLI's field are considered to be areas of archaeological potential. There is potential risk of damage to unknown archaeological deposits. A potential moderate to major adverse could arise due to possible disturbance to finds of regional to national importance (albeit the disturbed (by weathering) nature of the site would indicate a low probability of in situ finds)	An archaeological watching brief is recommended, followed by a summary report detailing any finds recorded	Negligible
Alterations to the historic landscape	The majority of works during construction will be located within the cove, and only visible from lifeboat station, chapel, coastal path, Ramsey Island and the sea. The impact is predicted to be of minor adverse significance	The programme of works has been minimised as far as practicable and good practice measures will be implemented	Minor adverse
Operation			
Disturbance and damage to known archaeological features	The installation of a stile or other access route over the field wall is unlikely to significantly damage the structure, and as such is considered to have a negligible impact	Any new access structures should be installed using traditional materials in keeping with the area	Negligible
Alterations to the historic landscape	During the station's operation there is anticipated to be a localised and permanent minor change to this historic landscape, however this is not considered positive or negative, but will represent an increase of man-made structures within the landscape	The design and use of sympathetic material will reduce the magnitude of any effect	Minor change
Tourism and Recreation			
Construction			
Disruption to users of the Wales Coast Path	St Justinian's is a popular destination for walkers throughout the year. Re-routing the path during peak periods could result in a moderate adverse impact	The following are recommended: • Implementation of a diversion order; • Identification of an alternative and safe acceptable route; and • Advertisement of any diversions	Minor adverse

Impact	Significance	Mitigation	Residual Impact
Disruption to kayakers and other marine users	The disruption to recreational users will be temporary and will only affect a relatively small number of users. An impact of negligible significance is anticipated	The following are recommended • Consultation with PCNPA, Pembrokeshire Council, POCG • Establishment of an exclusion zone. • Lighting and marking of construction vessels in compliance with Marine and Coastguard Authority navigational standards, and • Issue of a notice to mariners prior to commencement of works	No impact
Operation			
Disruption to users of the Pembrokeshire Coast Path	A very small diversion of the footpath is required. As such, an impact of minor adverse significance is predicted	It is proposed that the diversion is well advertised and signposted	Minor adverse
Navigation			
Construction			
Risk to navigation	Due to the nature of the proposals and the control measures that will be put in place, minimal risk to navigation is predicted	N/A	N/A
Disruption to boat users within Ramsay Sound	Several moorings will need to be relocated during both the construction works and permanently relocated for the operation of the new station. This impact is therefore considered under operational impacts below.	N/A	N/A
Operation			
Risk to navigation	Operation will not differ significantly to that of the existing station. The slipway and station will be appropriately	N/A	N/A

Impact	Significance	Mitigation	Residual Impact
	marked in line with MCA guidance Overall, no change to navigational risk is predicted		
Disruption to boat operators within Ramsay Sound	The operational area of the lifeboat station will require around five PBA moorings to be permanently relocated within Ramsey Sound In order to undertake this, discussions will be held with the PBA in order to agree suitable locations Since the moorings will not be lost, an impact of negligible significance is predicted	None required	Negligible
Traffic and Transportation			
Construction			
Impact on the local road network and its users	As a result of the increase in traffic anticipated as a result of construction traffic, an impact of moderate adverse significance is predicted	In order to reduce the potential impact, the following mitigation measures are proposed Preparation of a Construction Traffic Management Plan, use of designated routes to reduce congestion impacts, consultation with Pembrokeshire County Council to agree suitable timings of deliveries, and erection of public notices to keep road users informed	Minor adverse
Operation			
Impact on the local road network and its users	Since the operational situation will require a similar road use pattern to that which currently exists, no impact is predicted over and above the existing situation	None required	N/A
Noise and Vibration			
Construction			
Potential Noise Impacts from On-site Construction Activities	Desk based noise studies indicated that the noise level would be of moderate adverse significance if undertaken at night	If piling is not to occur at night, mitigation will not be required Good practise measures will however be in	Moderate adverse (if piling undertaken at night)

Impact	Significance	Mitigation	Residual Impact
		place regardless of the impact and residents will be kept informed of any changes to working specifications (such as requirements to work over night)	
Potential Noise Impacts from Construction Road Traffic	Desk based noise studies based on estimated vehicle numbers associated with concrete pours indicated that the noise level would be of negligible significance	A traffic management plan will be drafted and implemented. The following additional measures will also be required. Awareness training for drivers to ensure careful and considerate vehicle operation, a speed limit on the local roads close to NSPs. Vehicles should not wait close to NSPs and should turn engines off whilst waiting and if possible, ensure the access route is well maintained, i.e. potholes are filled in to reduce vehicle 'body slap' noise and vibration from driving on an uneven surface.	Negligible
Potential vibration during construction phase	Piling works will comprise rock drilled socketed piles, no percussive piling will be required. Low vibration levels and significant separation distance have resulted in no impact at the receptors	None required	No impact
Operation			
Potential noise and vibration during operation	Noise associated with operation after the works have been completed will be unchanged when compared to the background levels experienced before construction began. As such, no impact from noise or vibration is predicted during operation	None required	No impact

Impact	Significance	Mitigation	Residual Impact
Landscape and Visual Setting			
Construction			
Potential effects on landscape and seascape character	Effects during construction are likely to be of substantial magnitude on a high/medium sensitivity receptor, resulting in a major adverse significance for the duration of construction In terms of LCA18, the effects of the crane (most prominent element on the field on the clifftop) is considered to be of slight magnitude on a high/medium sensitivity area, resulting in an effect of moderate/minor adverse significance Effects on the high/medium sensitivity local seascape unit 34 are considered to be of moderate magnitude leading to an effect of major/moderate adverse significance Effects on LCA16 and local seascape units 34 and 35 are considered to be negligible	N/A	The effects of the construction phase are likely to result in some significant adverse effects. However, these will last only for the duration of the contract (18 months) and therefore it is considered that overall, there are no landscape/visual effects which are unacceptable
Potential effects on designated sites	The effects on the National Park, Heritage Coast and Landscape of outstanding historic interest are considered to be of slight magnitude on receptors considered to be high / medium sensitivity, resulting in a moderate adverse significance		
Potential visual effects	The effects on the two nearby bungalows are considered to be of major adverse significance as they will have direct views of the construction area Effects on the Pembrokeshire Coast are considered to be of moderate magnitude leading to an effect of major/moderate adverse significance Effects are considered to be of moderate magnitude and of major/moderate adverse significance on St Justinian's Chapel and Castell Heinif prehistoric promontory fort Effects on the current grade II lifeboat house are considered to be of major adverse significance		

Impact	Significance	Mitigation	Residual Impact
	due to proximity The effect on the grade II old lifeboat station is considered to be of slight magnitude and therefore of moderate adverse significance due to limited intervisibility The effect on the grade II Watchtower is considered to be of slight magnitude and therefore of moderate adverse significance as the bungalow intervenes between the two sites The effect on the grade II St Justinian's Well is considered to be moderate and therefore major/moderate adverse significance as the crane would be visible from the well, affecting its setting In terms of road users the magnitude of effect is considered to be substantial / moderate and therefore of major/moderate adverse significance		
Operation			
Potential landscape/seascape effects	The impact of the marine and land based works are considered to be major / moderate significance The effect on St David's headland LCA is considered to be of moderate/slight significance as the proposed lifeboat station is not visible inland The effect on St David's head to Ramsey island regional seascape unit is considered to be moderate/major adverse Effects on LCA16. Local Seascape Unit 34 (North Whitesands Bay and North west St Brides Bay) are predicted to be of negligible significance	N/A	Negligible to moderate/minor adverse
Potential effects on Pembrokeshire National Park and the Heritage Coast designation	The National Park is considered to be of medium-high sensitivity to this form of development A slight magnitude of effect results in an overall effect of moderate/minor adverse significance This is because the proposed development is carefully designed and in line with the function of place	N/A	Moderate/minor adverse
Potential visual effects	Impacts from 12 chosen viewpoints range from negligible	N/A	Negligible to severe

Impact	Significance	Mitigation	Residual Impact
(viewpoints)	to severe		
Potential visual effects on dwellings and settlements	The sensitivity of the receptor is therefore considered to be 'high', the magnitude effect is substantial/moderate, with a resulting effect of major adverse significance	N/A	Major adverse to the dwelling 100m to the north and major/moderate adverse to the dwelling 170m to the east.
Potential visual effects on national trails and public footpath users	The length of path affected equated to less than 1% of the total path length, so the overall magnitude is considered slight with resulting moderate adverse significance	N/A	Moderate adverse
Potential visual effects on users of nationally designated areas	Effects on receptors will range from substantial adverse magnitude close to, to moderate and slight adverse further away. The average effect would be moderate with resulting major/moderate adverse significance of effect. It is expected that the lifeboat station will become a visitor attraction in its own right and will not spoil the enjoyment or perception of the majority of visitors to the Park	N/A	Major/moderate adverse
Potential visual effects on scheduled ancient monuments	The effects are considered to be of slight magnitude and of moderate adverse significance on Castell Heinif prehistoric promontory fort and of slight / negligible magnitude and of moderate / minor adverse significance on St Justinian's Chapel. It should be noted that the assessment of effect on setting as a whole may be different from the effect on receptors on the sites	N/A	Moderate adverse and moderate/ minor adverse
Potential visual effects on listed buildings	The Grade II Watchtower is regarded as high sensitivity but is not publicly accessible although may have views of the development directly above or to one side of the intervening bungalow. As the residence is significantly closer and the proposal is also separated by an intervening cove and rocky promontory, the effects are	N/A	Moderate/minor adverse

Impact	Significance	Mitigation	Residual Impact
	likely to be of slight/negligible magnitude and moderate/minor adverse significance The Grade II St Justinian's Well would have limited intervisibility only with the clifftop building. The magnitude effect is therefore considered to be slight / negligible with moderate / minor adverse significance.		
Potential visual effects on road users	The proposed elements will add slightly to the built feeling of St Justinian's. The sensitivity of the receptor is considered to be 'moderate', the magnitude effect is slight, with resulting moderate/minor adverse significance.	N/A	Moderate/minor adverse

Lifeboats

Royal National Lifeboat Institution
West Quay Road, Poole, Dorset BH15 1HZ

RNLI (Trading) Ltd 01073377, RNLI (Sales) Ltd 2202240 and RNLI (Enterprises) Ltd 1784500 are all companies registered at West Quay Road, Poole, Dorset, BH15 1HZ

Operational Statement regarding the requirement for an All-weather Lifeboat at St Davids and assessment of alternative solutions.

St Davids lifeboat station was established in 1869 at St Justinians and has operated continuously ever since. St Davids lifeboat station is situated 19 nautical miles from Fishguard lifeboat station to the northeast and 18 nautical miles from Angle lifeboat station to the southeast. The station provides All-weather (ALB) cover from Strumble Head to Skomer Island and out to the main north/south shipping lanes situated west of the Smalls and the South Bishop Lights and Inshore Lifeboat cover from St Davids Head, through Ramsey Sound, and east to Newgale Sands. The area covered is subject to strong tidal effects and is open to the prevailing weather. The shore line is in the main inhospitable and flanked by off lying islands and reefs such that any vessel in distress in the area is likely to be driven ashore before assistance can be provided from further afield. Service statistics for the last 10 years are attached.

Concept of Operations and Strategic Performance Standards

National governments with a maritime littoral are required by international law to provide appropriate Search and Rescue (SAR) facilities within their area of jurisdiction. These requirements are enshrined in a number of statutes and conventions including for example, the International Convention for the Safety of Life at Sea (SOLAS) and the International Convention on Search and Rescue.

In the UK (and similarly in the Republic of Ireland) maritime surveillance and the initiation & coordination of maritime SAR is the responsibility of the Department for Transport (DfT) and undertaken by the Maritime and Coastguard Agency. Airborne assets are currently provided by a mixture of MOD (Navy and RAF) and contracted civilian operators; coastal shoreline SAR by volunteers of HM Coastguard; and waterborne SAR by volunteer lifeboat organisations. Of these, the Royal National Lifeboat Institution (RNLI) is the only one with a presence throughout the British Isles and the only one with a genuine All-weather capability. The RNLI provides well over 80% of all the waterborne SAR assets available to the UK government, and has done since 1824. The provision of lifeboats by voluntary organisations predates any international requirement for their provision.

This provision of services by the RNLI to the UK government is enshrined in their Concept of Operations which states:

The RNLI saves lives at sea throughout the United Kingdom and the Republic of Ireland by providing:

- A strategically located fleet of all-weather lifeboats which are available at all times and tactically placed inshore craft which are subject to weather limitations.
- A Lifeguard service on a seasonal basis.
- Safety education and accident prevention.

These three requirements are undertaken to a defined standard of performance, commensurate with the resources available, using trained and competent people who, wherever possible, are volunteers.

In order to meet these requirements, the RNLI is committed to:

- Achieve an average launch time of 10 minutes from notification to the RNLI.
- Reach all notified casualties where a risk to life exists, in all weathers, out to a maximum of 100 nautical miles.
- Reach at least 90% of all casualties within 10 nautical miles of the coast within 30 minutes of launch in all weathers.
- Reach any beach casualty up to 300m from shore within the flags on RNLI lifeguard patrolled beaches, within 3½ minutes.

In order to meet these commitments, the RNLI provides a fleet of strategically placed lifeboats available 24/7 around the coast. Generally, keeping a vessel afloat in a harbour is the preferred option but there is no such facility between Fishguard and Milford Haven. The two principal alternatives are: a carriage launch from a suitable and an accessible beach or; a slipway launch into deep water directly from a slipway boathouse with suitable landward access. The latter option, though the most costly in infrastructure terms, allows launching from rugged and exposed locations.

In the case of the existing and proposed lifeboat stations at St Justinian's, a slipway launch is the only practical method and has been well proven in over a century of operation. The location is unsuitable for a carriage launch due its exposure and the lack of a suitable, accessible beach. The rapid nature of the slipway launch has the added advantage of minimising delay once the crew have reached the relatively remote site from their places of work.

Alternative Options

Continue with the current facilities: Whilst this minimises the potential environmental impacts of the scheme, the new Tamar-class vessel could not be accommodated due to the boathouse size and inappropriate slipway structure. The station would therefore have to continue with the operation of the smaller, ageing Tyne class vessel, which would not meet the RNLI's commitments in the future because of lack of vessel speed. This class of vessel is now over 25 years old and is becoming increasingly difficult and costly to maintain due to obsolescence. The last of class will be withdrawn from service by the end of 2016. The provision of a Tamar class lifeboat at this location is essential as it is the sole lifeboat vessel within the RNLI fleet designed to be launched and recovered on a slipway, and provides the correct cover to meet future SAR commitments. As a result, this option is unacceptable.

Convert the existing boathouse or demolish and rebuild on the existing site: The option to convert the existing facility is not practicable as the age of the substructure is in excess of 100 years and would have to be replaced completely in order to meet the necessary 50-year design life criteria. Furthermore the existing boathouse is a Grade II listed building and therefore any alteration to its structure would require planning permission under the Planning (Listed Buildings and Conservation Areas) Regulations 1990. The changes required to accommodate a Tamar lifeboat, given its greater size compared to the current Tyne lifeboat, would necessitate a complete replacement of the boathouse superstructure, along with additional substructure to support an enlarged boathouse; a solution contradictory to the listing designation. Even should the reasonable expectation that listed build consent would be forthcoming a new facility would have an increased footprint presenting the same issues with regard to loss of habitat. Hence on environmental grounds this option offers little benefit and none of the operational advantages of the proposed new location.

An additional issue is that this option would entail the decommissioning and demolishing of the existing structure and construction of the new facilities at the existing site over a period of approximately 18 months. As there are no existing alternatives for ALB operation in the vicinity of St Justinian's this would require the RNLI to put the lifeboat off service for that period. The RNLI consider this unacceptable due to the strategic location and importance of the St David's lifeboat station.

Create a protected all-tide berth at St.Justinians: This option has been thoroughly researched and would require major breakwater works and dredging to provide the necessary depth of water and sheltered conditions from which to operate an ALB at all states of the tide and in all weathers. The environmental impact on habitat would be much greater than anything associated with the preferred option and the costs prohibitive. Additionally, the exposed nature of the site would make it difficult to guarantee the necessary level of protection under all weather and sea conditions.

Relocation to a new site from which an afloat or carriage launch would be possible: In the absence of an option to use the existing facilities, then either a new slipway launch into deep water, a carriage launch across an open beach or a permanent berth in the water are the only options remaining. A carriage launched arrangement is the least preferred operationally as the speed of response would be significantly affected when considering the time taken to get the vessel into the water, in combination with the remoteness of the station from crew members located in St Davids. Additionally, the structure required to accommodate a carriage vessel would be similar in scale to a slipway station, with the same consequent environmental impact. To relocate away from St Justinian's to an area with coastal conditions appropriate for either a carriage launch or an all-tide sheltered berth would have a detrimental impact upon the lifeboat cover making this option unacceptable.

This leaves the construction of a new slipway station close to the existing station as the only option that would allow the RNLI to meet the SAR commitments declared in its Concept of Operations.

Preferred Option

The preferred option requires the construction of the new station adjacent to the existing site. Options to the north of the existing site are restricted by water depths and the existing multi-use of the site by the RSPB and general public. Whilst an option to the south is technically feasible and would have a similar environmental footprint to that of the preferred scheme option, this would have a greater visual impact as new, separate arrangements would be required to access the new facility.

In carefully considering the available options and the environmentally sensitive nature of the site, the RNLI is therefore seeking consent for a slipway launch facility in the adjacent St Justinian's cove. This is considered to provide the best balance between meeting the required service levels (i.e. reach 90% of all casualties within 10nm of the coast within 30 minutes as this location is ideally placed in the middle of the two flanking stations, both of which are approximately 20nm in either direction), technical restrictions and environmental concerns regarding the footprint of the development in the European designated Special Area of Conservation. Once the new lifeboat station is operational, all RNLI activities, including SAR activities, at the existing lifeboat station will cease.

St Davids All-Weather Lifeboat

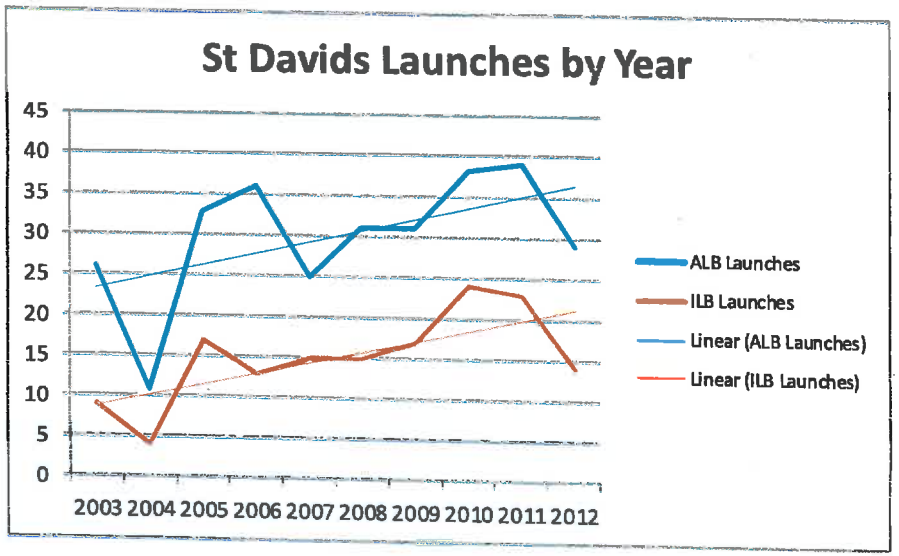
Year	Launches	Lives Saved	People Rescued (inc lives saved)
2003	17	0	35
2004	7	3	7
2005	16	2	11
2006	23	0	13
2007	10	0	13
2008	16	3	13
2009	14	2	15
2010	14	0	16
2011	16	0	11
2012	15	4	13
Total	**148**	**14**	**147**

St Davids Inshore Lifeboat

Year	ILB Launches	Lives Saved	People Rescued (inc lives saved)
2003	9	0	0
2004	4	0	0
2005	17	0	3
2006	13	2	2
2007	15	0	2
2008	15	0	6
2009	17	0	2
2010	24	0	8
2011	23	0	16
2012	14	0	9
Total	**151**	**2**	**48**

St Davids 2003-12 Total Launches

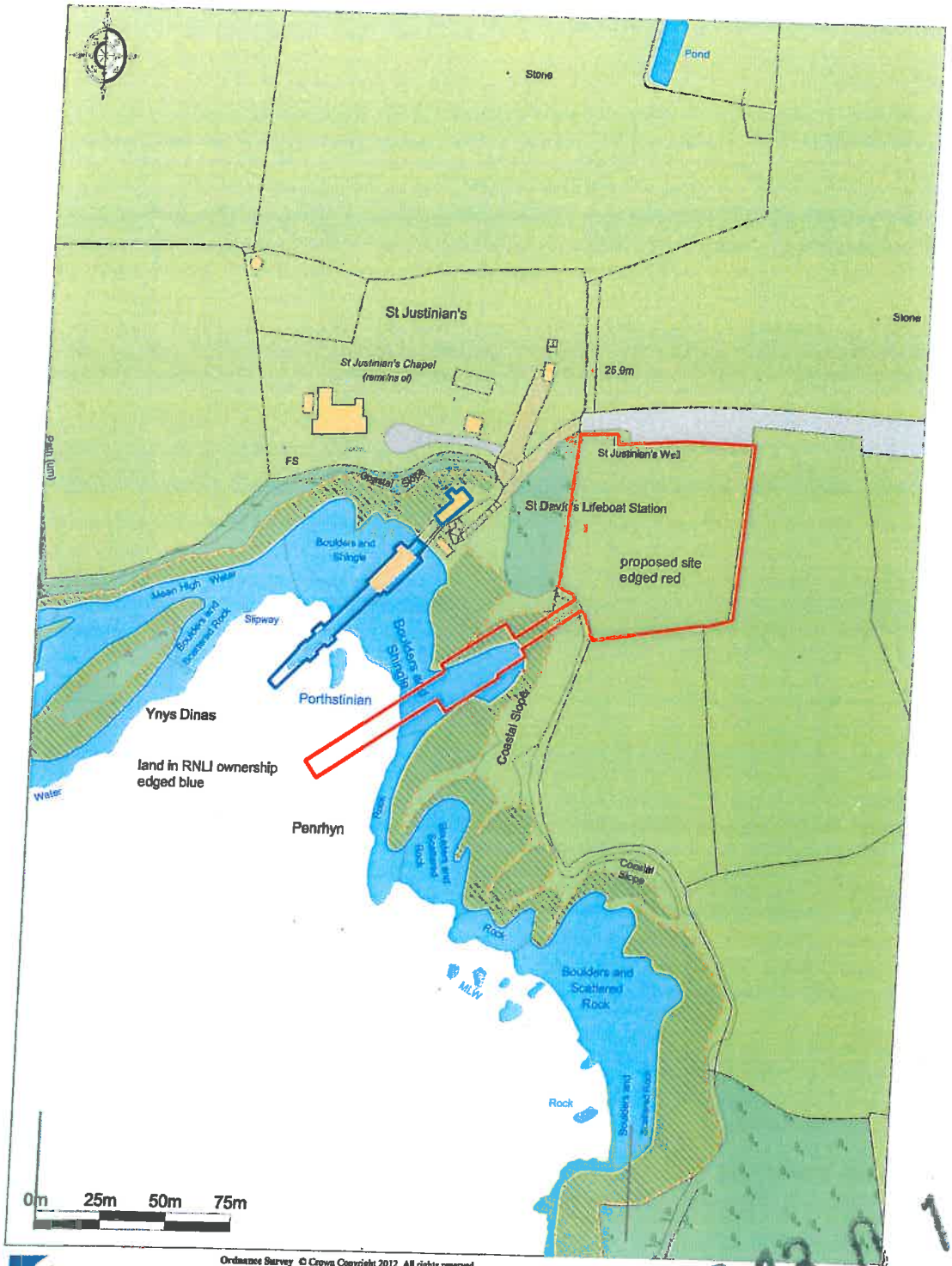
Year	ALB Launches	Lives Saved	People Rescued (inc lives saved)
2003	26	0	35
2004	11	3	7
2005	33	2	14
2006	36	2	15
2007	25	0	15
2008	31	3	19
2009	31	2	17
2010	38	0	24
2011	39	0	27
2012	29	4	22
Total	**299**	**16**	**195**



Item 6a)

Item 6a)

north



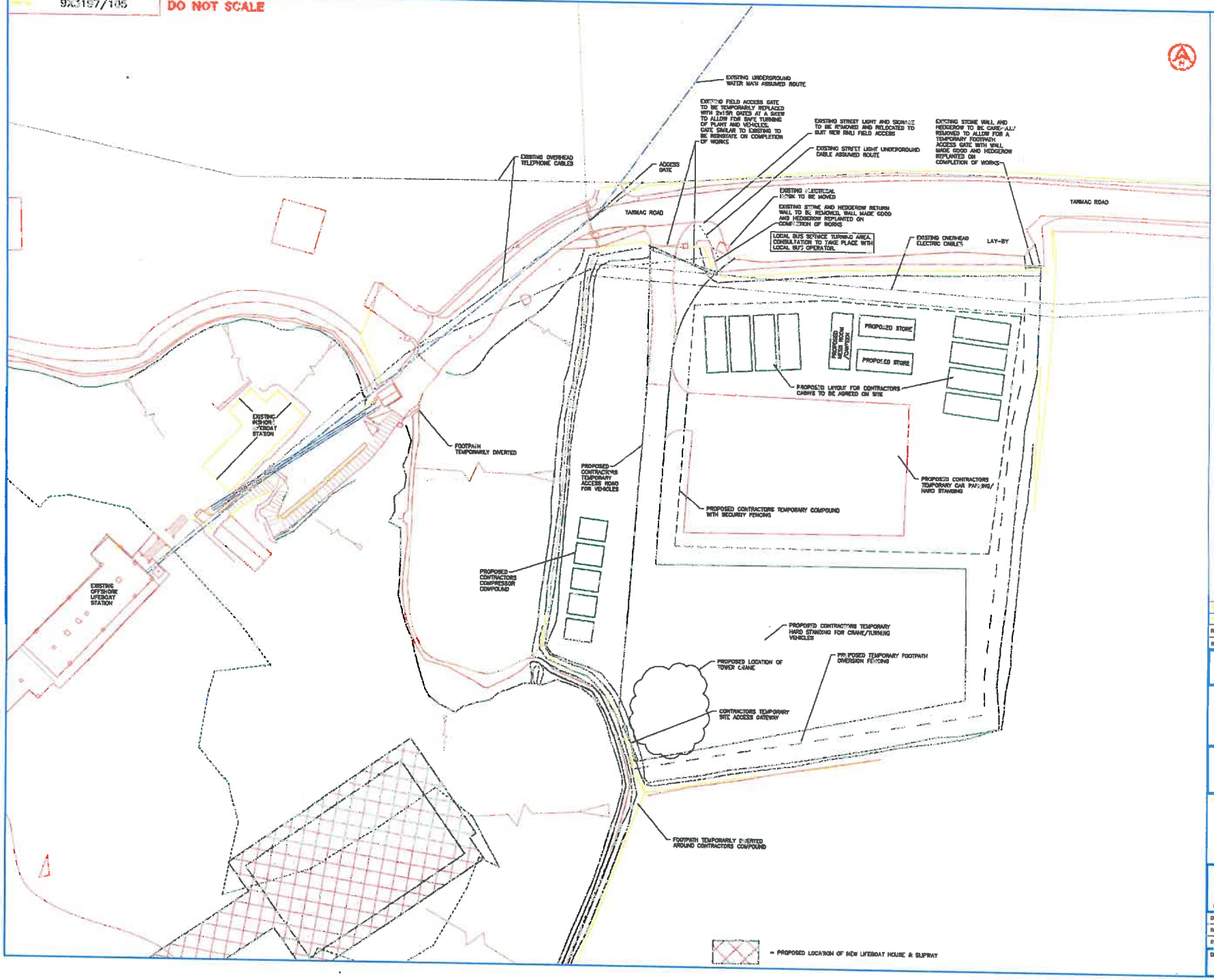
Lifeboats

Project: PROPOSED TAMAR LIFEBOAT STATION ST DAVID'S
Client: RNLI Trading Limited
Location plan

clive moore gwasanaethau pensaernïol / architectural services
Helyg, Yr Ala, Pwllheli, Gwynedd, LL53 5BL Tel : 01758 701711 (O) 01758 614621(H) 07909561842 (M) clive@moore1065.fsnet.co.uk

Dyddiad / Date
January 2013Title
Graddfa / Scale
1:2500
Cynllyn / Drawing
1202/P/01A

9X3197/105 DO NOT SCALE



NOTES

1. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES RELATIVE TO ORDNANCE DATUM NEWLYN.

NO 13 0 17

REV.	DATE	DESCRIPTION	BY	CHK	APP

REVISIONS

ROYAL NATIONAL LIFEBOAT INSTITUTION

Lifeboats 13 0 17

ST DAVID'S ENVIRONMENTAL STATEMENT

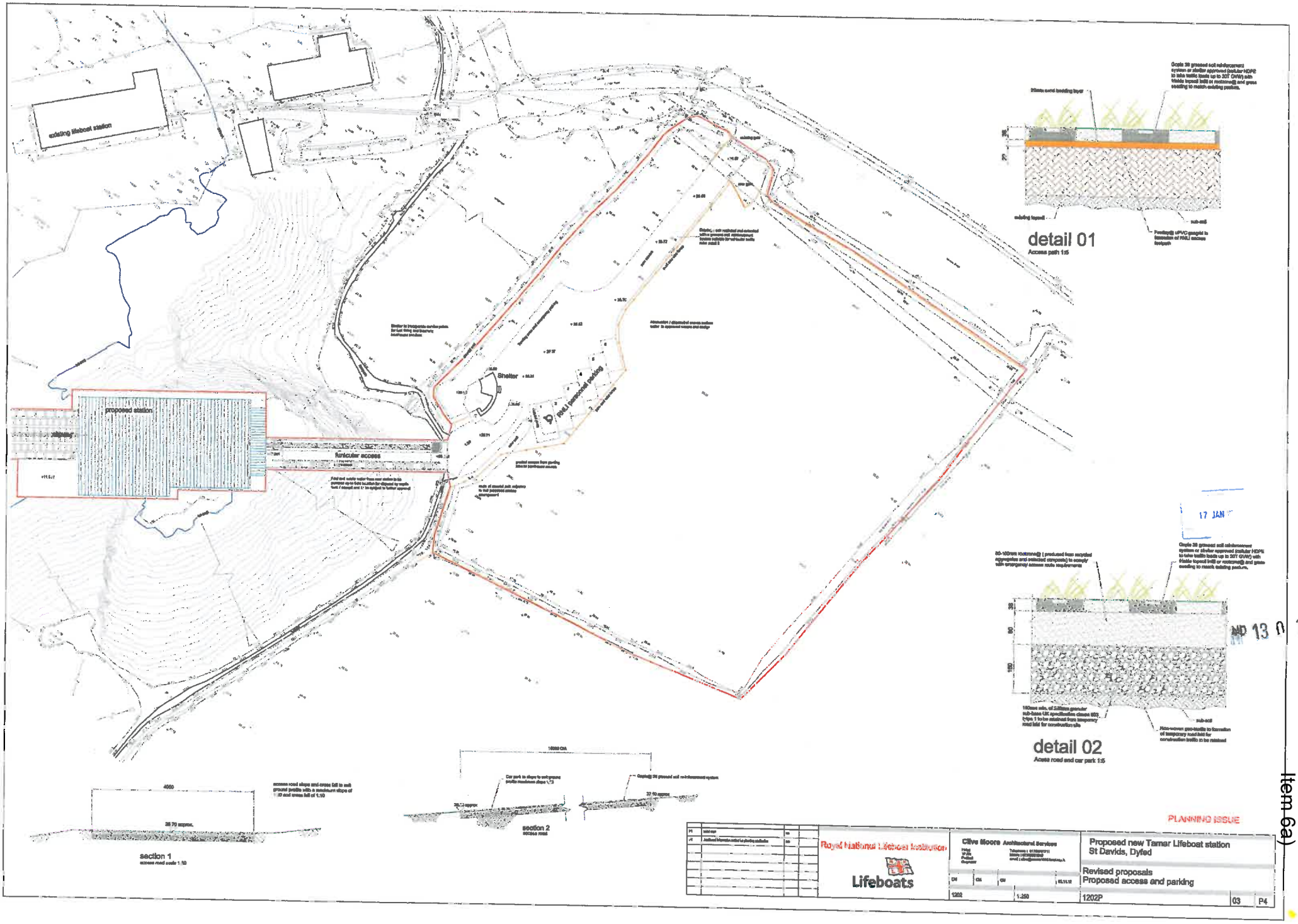
PROPOSED CONTRACTORS COMPOUND AREA FOOTPATH TEMPORARY DIVERSION

ROYAL HASKONING

DRAWN		CHECKED	PASSED
DATE		CLIENT'S REF.	
SCALE AT A1		AUTOCAD REF.	

DRAWING No. 9X3197/105 REVISION P2

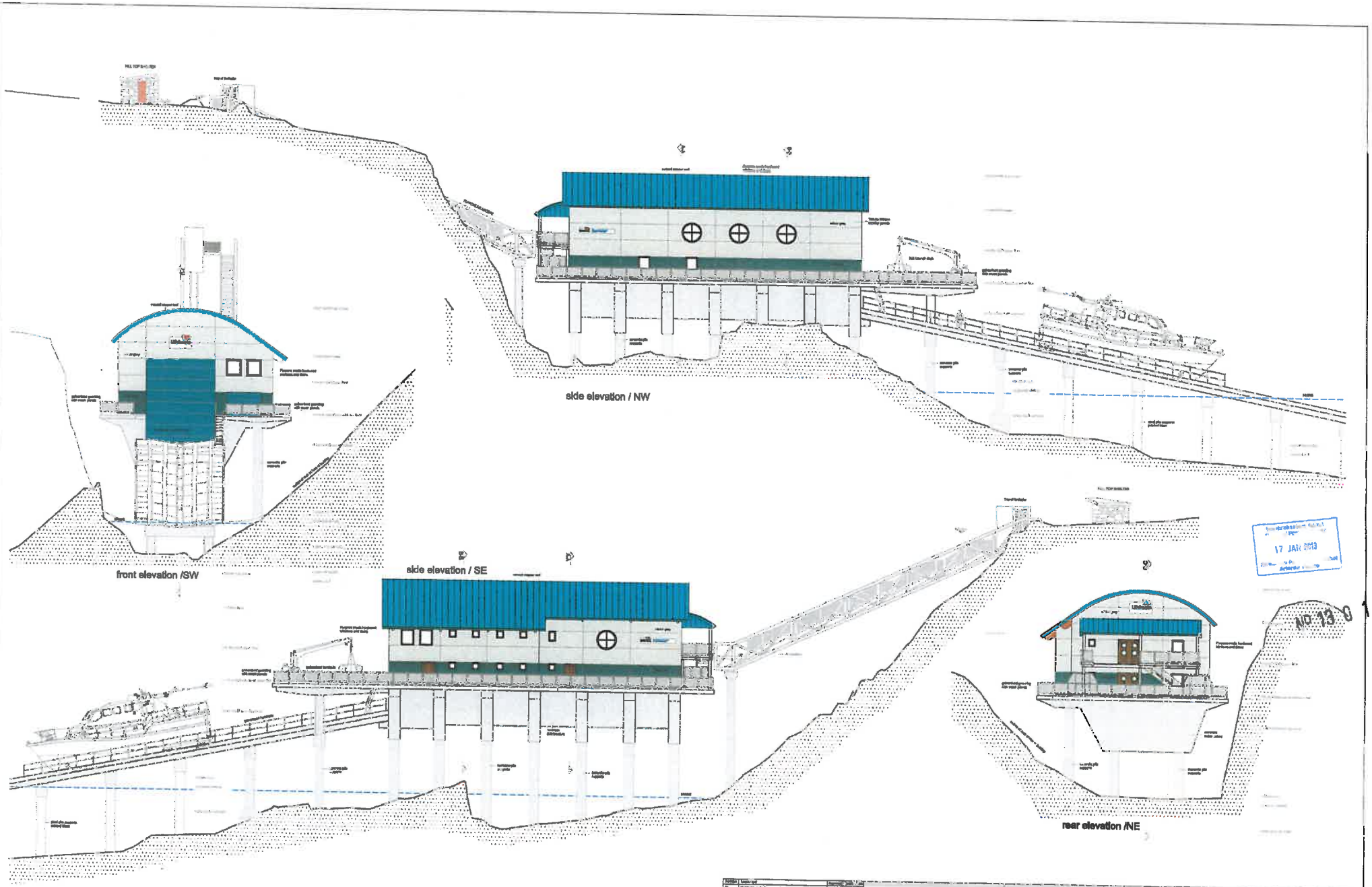
Item 6a)

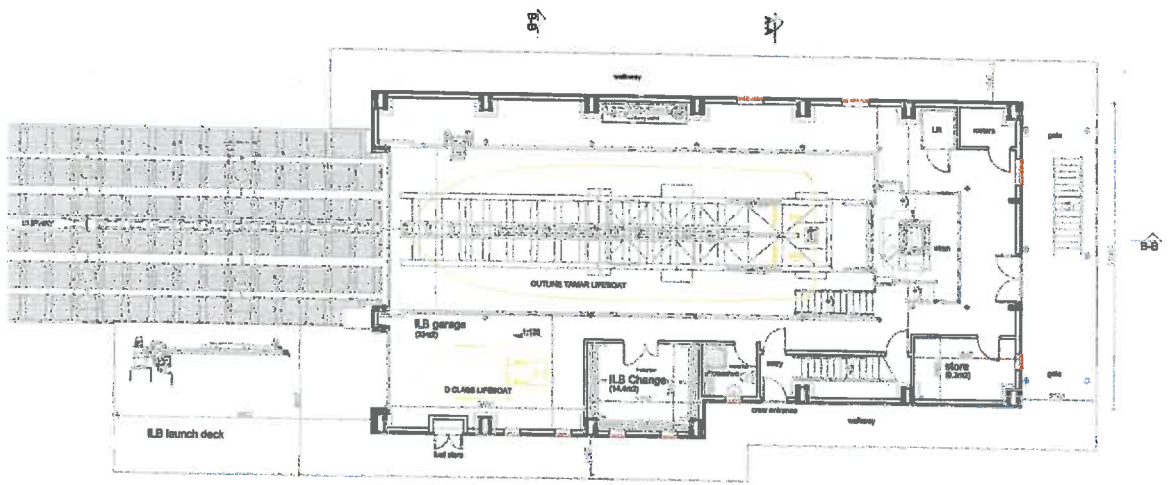


17 JAN

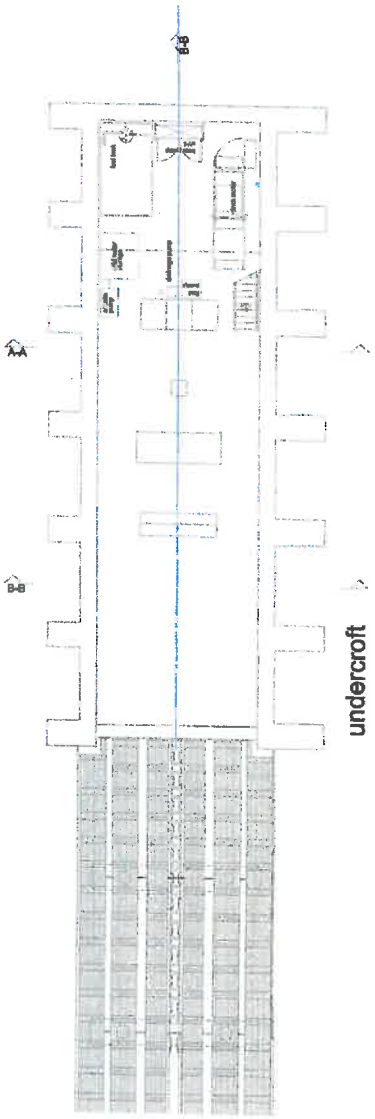
NP 13 0 17

Item 6a)


side elevation / NW
front elevation /SW
side elevation / SE
rear elevation /NE
17 JAN 2013
NO 13 0 17
Item 6a)
Royal National Lifeboat Institution
Lifeboats
Clive Moore Architectural Services
Proposed new Tamar Lifeboat station
St Davids, Dyfed
Revised proposals PLANNING ISSUE
Proposed elevations
1202
1:100
1202P
06
P2



lower level



undercroft

upper level

Royal National Lifeboat Institution

Lifeboats

Clive Moore Architectural Services

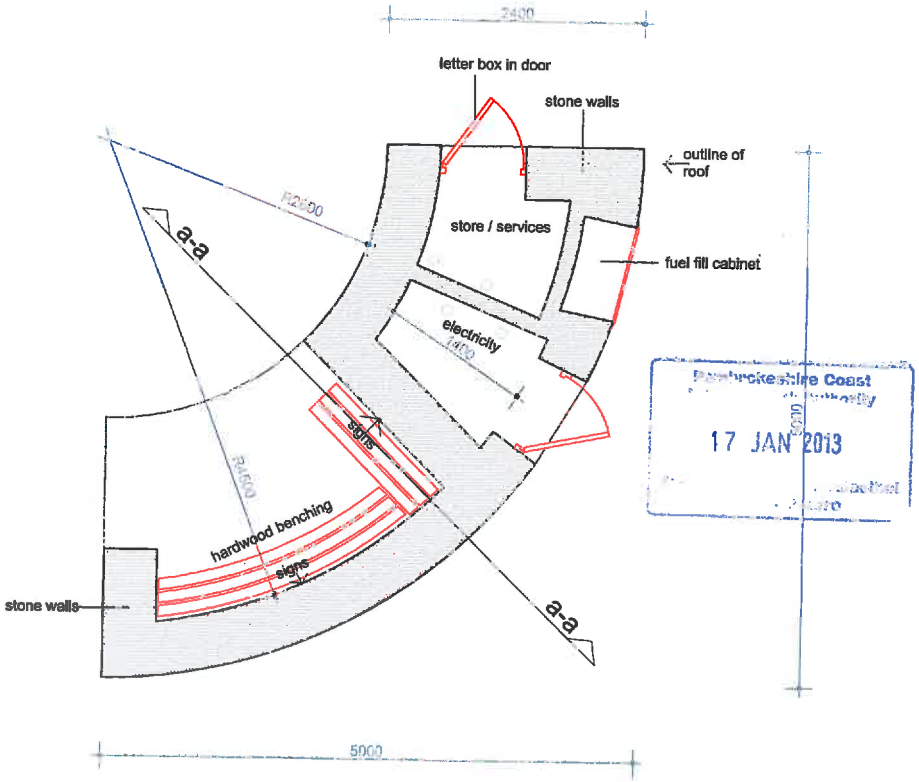
Proposed new Tamar Lifeboat station
St Davids, Dyfed

Revised proposals PLANNING ISSUE
Proposed plans

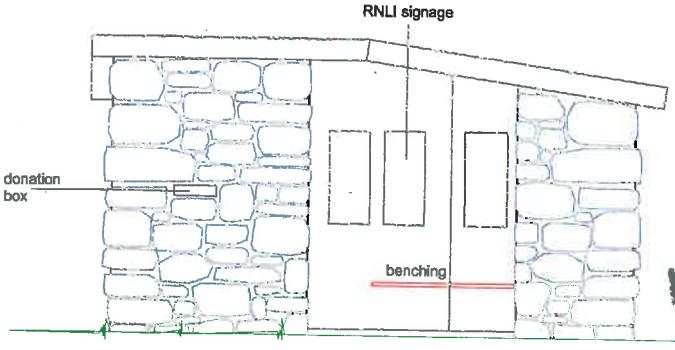
1202 | 1:100 | 1202P | 04 | P1

NP 13 0 17

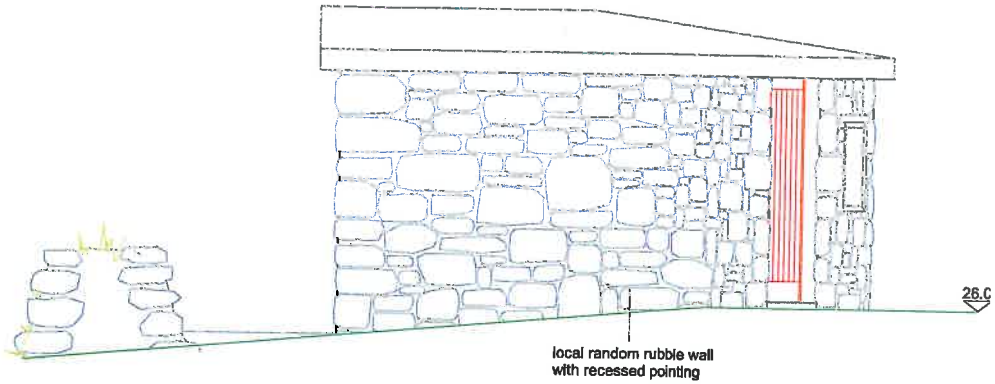
Item 6a)



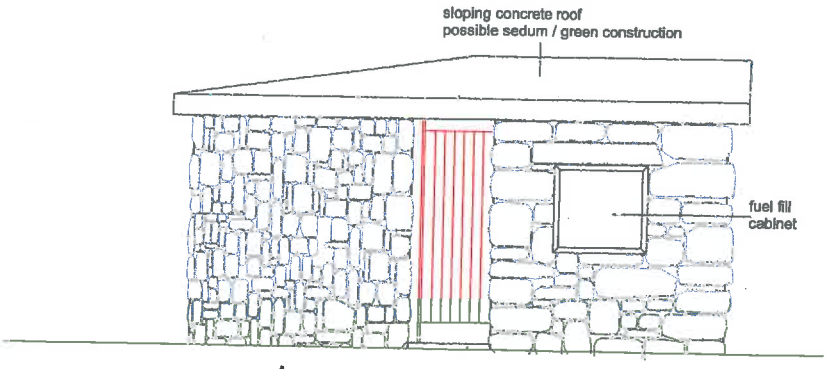
plan



front/west

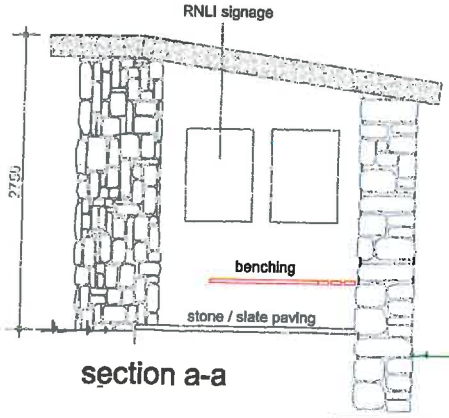


side/ south

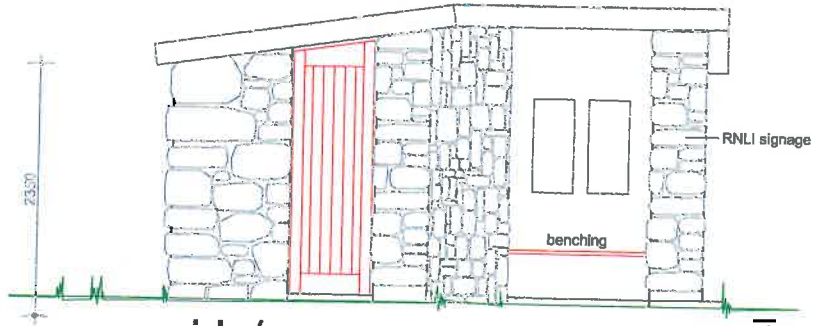


rear/ east

oak panelled door and frame



section a-a



side/ north

Item 6a)

Lifeboats

Project: PROPOSED TAMAR LIFEBOAT STATION ST DAVID'S
Client: RNLI Trading Limited
Title Cliff Top Shelter

clive moore gwasanaethau pensaernïol / architectural services
Holyn, Yr Ale, Pwllheli, Gwynedd, LL53 5BL. Tel: 01758 [illegible] (O) 01758 614621(H) 07808618[illegible] clive@moore1065.fsnet.co.uk

Dyddiad / Date
May 2012
Graddfa / Scale
1:50
Cynllun / Drawing
1202/P/010