Application Ref: NP/18/0051/OUT

Case Officer: Nicola Gandy
Applicant: Pembs Housing Association, Mill Bay Homes Ltd & Swangate Dev Ltd & Premier Inn Hotels
Agent: Geraint John Planning Ltd
Proposal: 38 Affordable residential dwellings, Hotel, 32 open market dwellings & associated car parking, access, landscaping, drainage & engineering works (Full Application)

Site Location: Land at Glasfryn Road, St Davids, Pembrokeshire, SA62 6ST
Grid Ref: SM75872571
Date Valid: 21-Feb-2018    Target Date: 07-Jun-2018

The application is referred to the Development Management Committee as it is classed as major development and in view of the public interest in the application.

Consultee Response

St Davids City Council: Support
PCNPA - Ecologist: Legal agreement/Conditional Consent for waste receptors
Dwr Cymru Welsh Water: S106 agreement and conditions
PCNPA - Tree and Landscape Officer: Conditional Consent
PCC - Drainage Engineers: No adverse comments
Natural Resources Wales: Conditional Consent – Awaiting further details in respect of drainage
Dyfed Archaeological Trust: Advised that the proposal is unlikely to have a significant impact on any buried archaeological resource.
CADW - Protection & Policy: No comments received (verbal update at committee)
PCC - Transportation & Environment: S106 Agreement & Conditional Consent
PCC Public Protection: Condition Consent
PCC Waste: Advised on waste requirements
Dyfed Powys Police Architectural Liaison Officer: Conditional Consent and advised that the design meets with ‘secure by design standards’.
Friends of Pembrokeshire National Park: Concern in respect of design of dwellings and hotel and request additional landscaping along highway verge
Wales & West Utilities: Informative

Public Response

The application was advertised in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, by letter, press advertisement and by site notice. The application has been advertised as being ‘out of accord’ with the Local Development Plan.

As the development is a ‘major’ development, the applicants also conducted a pre-application consultation (PAC) exercise with the local community for which a PAC consultation report was submitted with the application. Changes made include the conversion of the application from a hybrid application (outline and full permission) to a full application for planning permission.
281 letters of objection were received and 78 letters of support were received. Copies of the letters can be viewed in full on the application file, the following is a summary of the objections and supports comments received:-

**Objections**

- Development contrary to purposes and policies of LDP, including policies 5, 8, 9, 15, 20, 29, 30, 3, 44, 45, 47 of the LDP and Landscape Character SPG
- Development of this scale and nature not in keeping with National Park
- Site has not been tested for open market viability.
- Alternative brownfield sites within locality (Roch)
- Jobs created seasonal, low-paid, zero-hour contract employment - lack of suitable labour available within St. David’s
- Adverse economic impact on existing local accommodation providers, especially during off-season
- Applicant’s central resourcing policy displaces spending with local suppliers Economic leeching from local economy caused by by-passing local supply-chain
- Construction benefits to local area are short-term and materials will not be procured from local suppliers.
- Local distinctiveness/individuality would be damaged - range of independent retailers (with absence of large-scale commercialism) constitutes St. David’s current commercial character. Erosion of character damages St. David’s attractiveness to visitors/consumers
- Development sets precedent for 24 hour commercial activity within town.
- Scale of accommodation provision out-of-keeping with existing small-scale accommodation providers within area
- Degradation of the environment will repel future visitors, jeopardizing the long-term economic sustainability of the visitor offering
- ‘Carbon-footprint’ increased by hotels central resourcing policy transporting goods into area
- Concerns over increased air pollution, litter and noise pollution generation from increased visitor numbers
- Light pollution
- Detrimental ecological effects on neighbouring SSSIs (Waun Fawr)
- Lack of ecological and environmentally sustainable design ideas integrated into design
- ‘Urban’ style/massing/materials/exterior signage unsuitable and out of keeping with area
- Deterioration/maintenance concerns for materials specified
- Adverse visual impact
- Excessive height will result in an adverse visual impact on viewlines from Carn Llidi, Carn Lleithir, Pen Beri, Dowrog Common, St. David’s Airfield, Whitesands Bay, Aberieddy, Pwll Caerog, outlying SSSIs
- Insufficient landscaping and inability to screen with landscaping (trees) due to large scale and exposed position
- Structure sited too close to road
- Adverse impact on privacy
- Insufficient sewerage capacity, surface water drainage and water supply
- Concern over increased visitor traffic flow, on-going delivery movement to site, congestion and pedestrian safety and lack of separate access for deliveries
- Unsustainable location

**Housing objections**

- Insufficient employment opportunities in vicinity for 140+ proposed new residents
- Lack of vernacular character in specified materials and poor quality design
- Some house types are excessive height for location
- Insufficient parking provision
- Poor spatial arrangement - vehicle-oriented layout, failing to encourage pedestrian circulation and health lifestyles
- Lack of green spaces
- Privacy and overlooking issues
- Concern in respect of housing types & percentage too low of proposed social/affordable housing within development
- Sewage treatment works at Porthclais already functioning at maximum capacity - additional capacity unavailable to process demands of increased population
- Highway safety Concerns
- Concern over organisation of market, affordable and social housing within estate, causing social segregation within development
- Lack of covenants applied to properties to prevent sale of market-value homes into second-home ownership
- Request for phased implementation to allow local services to absorb population increase
- Scale of development disproportionate to size of existing community

An objection has also been received from the NoPi Group, i.e No to Premier Inn campaign, which objects for the following reasons:-

a) Hotel is out of accord with housing allocation in the LDP and the LDP’s strategy on the tourist economy
b) Economic harm to existing local accommodation providers and supporting businesses
c) Scale and design of the hotel and its impact on unique character of St Davids
d) Traffic Assessment is substandard in areas
e) Hotel is not required for the viable development of the affordable housing
f) No justification provided to demonstrate why a hotel needs to displace value housing land and why the hotel could not be placed elsewhere in the National Park
g) Insufficient information in respect of the visual impacts of the hotel, including lighting and advertisements
h) Lack of internal storage for some dwellings
i) Lack of disabled parking spaces for affordable housing
The officer’s appraisal deals with the majority of the objections received. However the following comments are in response to objections not covered within the main body of the report:-

- In respect of storage for the dwellings, the affordable housing will be built in accordance with the Welsh Government’s Development Quality Requirement (DQR), which stipulates the amount of storage required and both the market and affordable houses will be able to utilise their permitted development rights in terms of the provision of external storage facilities.
- The application has been submitted with a hotel proposed at this location, as such, the Authority has a duty to consider the application as submitted and not potential alternative locations for a hotel.
- The hotel element of the application is not being considered as enabling development.
- CGI images have been submitted with the application and are attached for information.
- Advertisements are dealt with separately to planning permission as such a separate Advertisement consent application would be required for any future adverts.
- Competition is not a material planning consideration, however the economic impact is assessed in the main body of the report.
- Well-being of Future Generations (Wales) Act 2015

Section 3 of the Act imposes a duty on public bodies to carry out sustainable development in accordance with sustainable development principles to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (section 5).

The well-being goals identified in the Act are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The duty has been considered in the assessment of this application. It is considered that there would be no significant or unacceptable impacts upon the achievement of wellbeing goals/objectives as a result of the proposed development.

Support

Hotel

- Provides additional opportunities for enjoyment & understanding of the special qualities of National Park and supports LDP duty
- Position sufficiently far from city to negate negative impacts on historic buildings
- Economic boost to area, job creation and support local businesses (projected increase in visitor footfall welcomed)

Pembrokeshire Coast National Park Authority
Development Management Committee – 6th June 2018
• Large company can provide additional benefits for employees which smaller businesses cannot supply
• Requirement for rooms (55 have been lost within locality over recent years) including more disabled access rooms in area
• Lack of flexibility within current accommodation supply – supply at capacity at peak season
• Increasing variety of accommodation available and accommodation required to develop out-of-season tourism initiatives. Diversification of type of tourist able to afford to stay in St. David’s welcomed
• Accommodation provided suitable for business users – providing accommodation suitable for a wider range of clientele in vicinity, year-round, encouraging diversification of economic activity in area
• Accommodation to be provided of a ‘national recognized standard’, improving standards and will encourage fair competition in accommodation and restaurant prices
• Evolution of the city, providing modern-facilities
• Application site is not of high aesthetic value, so development appropriate to location and there is a precedent of other large-scale development adjacent to the site (factory and rugby club)
• Insufficient parking for existing city-centre establishments - an edge-of-settlement development with stand-alone parking is welcomed
• Gateway to city is currently rough land with scrub - creating a prominent feature at site will improve gateway
• Site well connected by road to settlement and well serviced by roads – taking deliveries/movement of guests to edge-of-city site, which reduces congestion/parking difficulties in city centre.
• Site located on well-serviced bus route
• Precedent for lighting in this area, as rugby club adjacent uses floodlighting
• Mixture of housing type & size provided by development welcomed
• Inadequate supply of affordable housing available in locality – development welcomed. St Davids has a large out-migration of younger demographic to areas where housing is more affordable
• Increased residential accommodation required in order to support local services & ensure long-term sustainability of community, which is increasingly becoming composed of older demographic
• Encouragement of ‘families’ to settle in vicinity will promote cultural sustainability & use of welsh language
• Support social well-being of community
• New build development in keeping with surrounding buildings (factory and rugby club)
• Design of buildings well-considered to minimize environmental impact
• Sustainable site within easy walking distance of city centre, services and schools

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

Pembrokeshire Coast National Park Authority
Development Management Committee – 6th June 2018
LDP Policy 05 - St Davids Local Centre  
LDP Policy 08 - Special Qualities  
LDP Policy 09 - Light Pollution  
LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest  
LDP Policy 11 - Protection of Biodiversity  
LDP Policy 12 - Welsh Language  
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park  
LDP Policy 29 - Sustainable Design  
LDP Policy 30 - Amenity  
LDP Policy 32 - Surface Water Drainage  
LDP Policy 35 - Visitor Economy  
LDP Policy 44 - Housing  
LDP Policy 45 – Affordable housing  
LDP Policy 48 - Community Facilities and Infrastructure Requirements  
LDP Policy 52 - Sustainable Transport  
LDP Policy 53 - Impacts on traffic  
PPW9 Chapter 04 - Planning for Sustainability  
PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast  
PPW9 Chapter 06 - Conserving the Historic Environment  
PPW9 Chapter 07 - Economic Development  
PPW9 Chapter 08 - Transport  
PPW9 Chapter 11 - Tourism, Sport and Recreation  
SPG06 - Landscape  
SPG08 - Affordable Housing  
SPG12 - Parking  
TAN 12 - Design  
TAN 13 - Tourism  
TAN 18 - Transport  
TAN 23 - Economic Development  

**Constraints**

Special Area of Conservation - within 500m  
LDP Allocation  
LDP Designation  
LDP Mineral Safeguard  
LDP Open Space  
Historic Landscape  
Safeguarding Zone  
Hazardous Zones  
LDP Centre:50pc aff housing;30 units/ha  
Recreation Character Areas  
Landscape Character Assessment

Pembrokeshire Coast National Park Authority  
Development Management Committee – 6th June 2018
Officer's Appraisal

Development and Site Description

Development

The application seeks full planning permission for the following:-

38 No. Affordable housing units
32 No. Market dwellings
63 bed hotel

The affordable housing is comprises of a mixture of 1, 2 and 3 bed two and single storey properties and the market housing is comprised of a mixture of 2, 3 & 4 bed properties, again both two and one storey in height. The buildings are traditional in form and some of the two storey dwellings reach a maximum height of 8.6m.

The proposed 63 bed hotel is 2.5 storey, ‘L’ shaped in form fronting both Glasfryn Road and Fishguard Road, and will reach a maximum height 14 m. The entrance to the hotel will be on the western elevation via the car parking area. The proposed hotel measures 65m along the eastern boundary (fronting Glasfryn Road) and the roof form is broken into three components, measuring 16m, 20.4m and 20.4m, the northern elevation (fronting Fishguard Road) measures 32.8m again with the roof form broken up into three components measuring 8m, 8m and 15.8m. In respect of the height of the proposed hotel, the highest element is the north eastern corner which measures 14m, reducing to 10m to the southern section of the hotel in a stepped roof form and reducing to 12.8m in a stepped for to the western section.

The hotel also proposes a restaurant at ground floor level which accommodates 43 covers.

All three elements of the development propose associated landscaping, footpaths and car parking areas. The hotel element also proposes external plant areas.

Access to the site will be gained via three access points; the first of which serving 60 of the proposed dwellings off Glasfryn Road, the second, also off Glasfryn Road serving the hotel only and thirdly access serving 10 dwellings will be gained from Fishguard Road.

Site

The application site is located to the north eastern boundary of St Davids. The site is bound by Glasfryn Road to east, Fishguard Road to the north, existing residential development at Heol Dewi, Maes Dewi and Mount Gardens to the west and agricultural land to the south. The site covers an area of 3.23ha, has previously been used of grazing purposes and has several hedge banks surrounding the perimeter and breaking up sections within the site.

There are existing accesses serving the site to the east off Glasfryn Road and to the north off Fishguard Road. A multi user path runs along the eastern boundary of the site.

In terms of the built form residential properties are located to the west of the site, the St Davids Assemblies buildings (component manufacturers) are located to the east
and the rugby club is located to the north west. The site is located approximately 270 m from the St Davids Conservation area.

**Relevant Planning History**


**Key Issues**

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity
- Tourism & Economic Impact
- Highways
- Ecology
- Drainage
- Affordable housing
- Lighting
- Landscaping
- Historic Environment
- Other Material Considerations

**Policy and Principle of Development:**

Planning Policy Wales (Edition 9, 2016) (PPW) is the national planning policy for Wales. At para 4.6.2 it states that an effective way to achieve regeneration is to foster integrated communities within the existing settlement pattern by promoting mixed use development, comprising appropriate combinations of housing (including affordable housing), employment, retailing, education, leisure and recreation uses and open space.

National Policy is translated at a local level via the Local Development Plan (LDP), which was adopted by this Authority in 2010.

The application site is located within the designated Centre boundary for St Davids as defined in the LDP. LDP paragraph 4.37 states that by the end of the plan period in 2021, St Davids will have had, amongst other things, new housing developed with a substantial element of affordable housing and there will be small scale employment in addition to the St Davids Assemblies site. LDP Policy 5 St Davids Local Centre, relates specifically to St Davids and at criterion a), states the land use priorities will be to meet the housing, in particular affordable housing, needs of the local area. Criterion b) of this policy states that a land use priority will be to provide for employment development to meet the needs of the local area.

In respect of the proposed development, the application site accommodates the majority of housing allocation HA737 of the LDP, which allocates the land for a total of 90 units on 3.8 hectares. The policy requirement for affordable housing on this allocation is 25%, which would amount to 22 of the 90 units being affordable units.

The application proposes to provide a total of 70 residential units, on approximately 2.8 hectares (25 per hectare housing density), and a hotel. Thirty-eight of the residential units proposed will be affordable housing provided by a registered social
landlord. This is a 72% increase in the amount of affordable housing expected from the site, rising from 22 – 38.

The LDP housing strategy identifies that there is no need for market housing in the National Park as the population projections show the Park population to remain static. At paragraph 4.201 the LDP states:

‘Though there is no reason to allocate housing land in order to house an increasing population, there is in order to build more affordable houses so that the proportion of affordable to market housing better reflects the housing needed in the National Park’

In terms of housing need, the need identified for St Davids is stipulated in the Housing Background Paper (updated April 2017) which states that the annual housing need for St Davids is 34 units. The proposed development providing 38 affordable units and 32 open market dwellings would go some way to achieving this figure.

The considerable and welcome additional provision of affordable housing on the site as part of this particular proposal directly meets the Authority’s housing strategy and is welcomed.

Whilst the hotel element of the application, is not in accordance with the allocation in the LDP, it does not impinge on the housing strategy of the Plan as the proposed provision of affordable housing is already greater (by 70%) than would be required through the application of the contribution set out in the Authority’s Supplementary Planning Guidance on Affordable Housing. As stated above market housing is not needed in the National Park. The loss of housing land to a hotel is not considered to be harmful to the National Park or the needs of the community as the site is already overachieving on the reason it was allocated in the LDP which was to make provision for affordable housing. The hotel element on this allocated housing site therefore does not conflict with the overall housing strategy of the LDP.

Furthermore, the application site does not fully utilise the full site allocated for housing in the LDP, as it leaves out a section of land to the south. Therefore, there is scope for a future application for additional housing on this allocation and the proposed layout has taken account of this.

Whilst a minimum density of 30 units per hectare is required under LDP Policy 44 Housing (where compatible with the character of centres), it is noted that this proposal has a lower density (24 per hectare) than the LDP policy. However, given the design, layout, amount of open space and landscaping to be provided the proposed density is also therefore considered acceptable in principle.

Siting, Design Impact of the proposal on the Special Qualities of the National Park:

Policies 8 and 15 of the Local Development Plan seek to protect and enhance the special qualities of the National Park.

Policy 8 (Special Qualities) lists 9 priorities - the most relevant to this application being:

a) to ensure that the sense of remoteness and tranquility is not lost and wherever possible enhanced;

b) the identity and character of towns and villages is not lost through coalescence and ribboning of development or through poor design and layout of development;

c) the pattern and diversity of the landscape is protected and enhanced;

Pembrokeshire Coast National Park Authority
Development Management Committee – 6th June 2018
e) that development restores or wherever possible enhances the National Park’s ecosystem; and

f) to ensure that local biodiversity action plan species and habitats are protected for their amenity, landscape and biodiversity value.

In addition, Policy 15 seeks to prevent development that causes significant visual intrusion, is insensitively and unsympathetically located within the landscape, introduces / intensifies a use that is inappropriate to its location, that fails to harmonise with the landscape character of the National Park, and that loses or fails to incorporate important traditional features.

The application site is within Landscape Character Area 17 as defined in the Landscape Character Assessment Supplementary Planning Guidance. Area 17 is notable for having a strong scene of place owing to the cultural heritage of the City, the Cathedral and its associated buildings. The Landscape Character Assessment identifies the site as being a Gateway location to St Davids, and in its current form it is argued that the site adds little to the impression of St Davids when entering from a north easterly direction.

The application proposes a mixed use development of residential and a hotel. The site is allocated for housing, as such, the principle of housing on this site has been accepted in terms of its impact on the landscape. However, the proposed hotel element has not previously been considered at this location.

Housing

The proposed housing layout incorporates a significant amount of landscaping both within the site and along the parameters of the site, which is welcomed. The site also proposes a central play space for occupiers of the properties and several footpaths linking different elements of the residential site. Landscaping is proposed to break up areas of car parking and at the entrance to the site.

Whilst a number of the rear elevations of the properties will be within close proximity to the boundary of site with Glasfryn Road, consideration has been given to the design of these properties to ensure that domestic paraphernalia such as washing lines, shed, which usually dominate rear elevation scenes do not dominate in this instance. These properties are generally 1 bedroom flats with communal/internal washing lines and integrated storage facilities. Furthermore the existing and enhanced hedge bank will screen a large part of these properties from public view.

In terms of the design of the dwellings, the dwellings are of traditional form and scale however the materials proposed provide a contemporary appearance. Whilst the materials are contemporary such as fibre cement boards, they are also combined with more traditional materials such as render and stone, which will reflect materials used in nearby properties.

Whilst the developer has proposed the use of similar material on both affordable and open market aspects of the housing development, it is considered that the use of materials covering both elements of the housing development needs to be more unified so a planning condition is recommended requiring details and samples of the materials to be used in the external elevations of all residential units to be submitted to and approved in writing by the local planning authority.

The immediate context of the site lacks a definite character, with two storey residential to the south west, single storey dwellings to the west, the factory units to
the east and open rugby playing fields and rugby club to the north. There is no dominant style of character to this part of St Davids, however the form and scale of the proposed dwellings are similar to that of the existing dwellings and, as such, the proposed dwellings are considered to sit acceptably within the landscape, particularly given the level of landscaping proposed both within and surrounding the site.

An area of public open space is proposed centrally within the housing development with another area of open space towards the southern end of the site, which will serve the entire residential development and will create an inclusive layout.

Having regard to the above, the proposed housing given its form, scale and design, is not considered to have an adverse impact on the special qualities of the National Park or on the visual amenities of the immediate area, subject to conditions relating to materials and landscaping.

Hotel

The application proposes an ‘L’ shaped hotel to the north eastern corner of the site. The entrance to the hotel will front the car parking area and a glazed restaurant element is proposed at ground floor level at the north eastern corner.

Prior to the submission of the application, the proposal was subject to a review by the Design Commission for Wales (DCfW), which made comments in respect of the housing element, which have generally been taken on board by the applicant and made the following comments in respect of the hotel element:-

‘The hotel must fit into the wider masterplan and landscape setting. Particular attention should be given to the treatment of the corner, particularly the upper floor which currently presents a blank upper floor facade to the street. Consideration could be given to how void within the roof space could be used more effectively and honestly to provide additional accommodation and improve this elevation. Legibility and the quality the experience of arriving at the hotel as well as the lasting impression of leaving the site should inform where the access point is located. This experience would be much better if access was possible from Fishguard Road and this should be explored again with the local highways officer.’

Certain aspects of the advice from DCfW has been taken on board by the applicant, i.e. the void element and by inserting windows in to the elevation facing Fishguard Road, but due to highway safety concerns and the commercial and operational requirements of the hotel it has proved impracticable to incorporate some of the advice into the overall design and layout.

Whilst the principle of housing on the site and the impact of housing on the landscape had already been accepted through the examination of the LDP, the principle of a hotel and its impact on the landscape has not been previously considered. Consequently, a Landscape and Visual Impact Assessment (LVIA) was submitted with the application together with a series of CGI images.

The LVIA found that the most sensitive receptors to the development would be residents with rear facing windows facing the site, vehicles approaching St Davids from the north-east direction (Fishguard) and users of public rights of way within the vicinity of the site. There are also more distant views of the site from higher ground toward the northern coast of the peninsula.
The LVIA noted that the proposed development would make a positive contribution to the local landscape character and visual amenity by making more of an impression when entering St Davids from a north easterly direction through new buildings which are more sympathetic in design and through use of materials than the existing impression, which includes the rear elevations of properties. The LVIA notes that the existing dwelling interface with the countryside to the east is ‘rear facing’ and unmitigated, which detracts from the quality of the wider landscape. The LVIA concludes to state that the development will not create an unacceptable effect in terms of landscape character or visual amenity.

In terms of the impact of the development on vehicles travelling along the recently improved Glasfryn Road, the proposed dwellings and hotel will have a significant impact on the immediate landscape setting, however, given that this is an allocated site the principle of a landscape change at this location has already been accepted.

From public rights of way, there will be impacts from wider views and the hotel element will be the prominent feature on the site due to its height. However, it will not be an individual isolated building in the landscape as it will be located within the existing built form of St Davids within the context of the neighbouring factory buildings and houses. There are also a number of large farm complexes located within wider views of the site. The visual impact on visual receptors using the public footpaths and rights of way will not be so adversely significant as to warrant refusal of the scheme. The general palate of materials used will complement the location, with limited impact on sensitive visual receptors.

Natural Resources Wales (NRW) has commented on the LVIA and are generally in agreement with its findings. NRW advise the retention of the hedge banks as boundary features and welcome the planting of new hedges and trees.

The scale of the hotel building is larger than the surrounding domestic buildings and higher than nearby commercial buildings, however given that the building will be located within the built form of St Davids and has itself a form and general palette of materials which complements the location and with its limited impact on sensitive visual receptors it is not considered that the scale is so adverse on the National Park to warrant refusal of the scheme can be supported.

In respect of materials – further detail is required. The hotel will need to complement the residential element and the visual amenities of the area of the development as such a condition is recommended requiring details and samples of the material to be submitted to and approved in writing by the local planning authority.

Having regard to the above and following several site visits, it is concluded that as:

i. the development is within the built form of St Davids;
ii. there is no strong architectural style within the immediate context of the application site;
iii. the presence of other large buildings in wider landscape views; and
iv. the minimal adverse impact on visual receptors, the proposed development is acceptable in terms of its impact on the immediate and wider landscape of the National Park, but subject to conditions in relation to levels, materials and landscaping.
Amenity:

Policy 30 of the LDP seeks to avoid development that is inappropriate for where people live or visit, of an incompatible scale with its surroundings, leads to an increase in traffic or noise or odour which has a significant adverse impact.

In terms of the impact of the development on the residential amenity of the occupiers of the existing properties along the western boundary of the site, the development has been designed so as to ensure that there are no habitable room windows directly facing existing habitable room windows at a distance less than 21m, and no first floor windows directly overlooking gardens at a distance less than 10.5m. Given the distances between the existing and proposed residential properties the development will not result in an adverse impact on privacy standards.

In respect of overshadowing and dominance of the development on the existing residential built form, the proposed development has been designed to ensure that there is sufficient distance between the proposed and existing buildings to prevent any unacceptable overshadowing or dominance.

The amenity of the future occupiers of the proposed development has been carefully considered and properties are provided with sufficient levels of amenity space, privacy standards and the orientation of properties ensure no adverse overshadowing or dominance will occur.

The proposed hotel will have some form of external plant machinery within its ground. In order to ensure that there is no noise issue associated with this, a condition is recommended requiring details of the plant to be submitted to and agreed in writing by the local planning authority.

A condition is also recommended to control the delivery times of vehicles to and from the hotel so as to ensure there is no adverse impact on residents in terms of noise and disturbance.

Having regard to the above, the proposed development is considered to be acceptable in terms, of amenity and complies with Policy 30 of the LDP.

Tourism and Economic Impact:

Tourism

PPW9 at para 11.1.1 notes that tourism is vital to economic prosperity and job creation in many parts of Wales. It is a significant and growing source of employment and investment, based on the country’s cultural and environmental diversity. Tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas. Welsh Government also has a number of strategies which relate to tourism, which includes the Strategy for Tourism 2013-2020.

In terms of local policy, the LDP identifies that tourism is an important asset for the National Park. Strategic Policy 35 (Visitor Economy) and para 4.37 in particular sets out the role that St Davids plays and states that by 2021 that the strategy for visitors is to attract an optimal number, origin, type duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance.

The planning statement submitted with the application states that the average occupancy rates of Premier Inns are 80%; with Tenby and Haverfordwest higher than average at 86% throughout the year. The statement states that the Premier Inn will bring new visitors to St Davids during the quieter months of the year rather than...
competing for existing levels of trade during the off-season. The statement estimates that more than 44,000 guests would stay at the hotel throughout the year and suggests that the hotel would provide a different type of hotel offer in St Davids. It is considered that the proposed hotel is likely to have a positive impact on tourism in the immediate vicinity, bringing more people to the area and will offer a range of serviced accommodation not currently widely available within the locality.

However, the potential increase in visitors also has to be balanced against the impact on the special qualities of the National Park. Whilst an increase in visitor numbers will undoubtedly have an impact the site is located within the City of St Davids with a wide range of facilities and services available locally in easy walking distance, and good transport links for visitors to explore surrounding areas and visit leisure attractions. The hotel will offer year round serviced accommodation rather than seasonal accommodation, and it is considered that there is capacity to take such numbers without adversely affecting St Davids and the wider National Park.

**Economic Impacts**

The application was submitted with an Economic Impact Statement which considers the quantifiable impacts of the proposed development both during the construction phase and the operational lifetime of the development.

The report states that the construction phase of the whole site will result in the following employment gains:-

- 59 full time temporary jobs for a period of 10 months (construction phase)
- 55 direct net additional full time jobs
- 28 indirect and/or induced jobs generated within the supply chain and from onward employee expenditure

The report concludes by stating that the operational phase will result in an uplift in visitor expenditure worth an estimated £1.5 million to the local economy per annum, resulting in an additional 11 direct full time jobs in the leisure, tourism and restaurant industries.

The objection received from the NoPi group states that the economic assessment of the hotel is unreliable and flawed, as NoPi consider that any economic benefits of the proposed hotel will be offset by the economic harm it imposes on local accommodation providers and supporting businesses. The objection refers to the development being contrary to Policy 35 of the LDP in that the hotel will not attract visitors in the off-peak season other than to offer more bed spaces to an already depressed market that has excess supply over demand out of season, thus failing to conserve and enhance the National Park.

The NoPi objection includes an independent economic assessment of the proposed hotel by Professor Andrew Oswald and Dr Stephen Priddy, which has previously been circulated to Members by the NoPi group.

The authors of the NoPi group report do not consider the Economic Impact Assessment submitted by the applicant to be reliable as, they state, it fails to use any...
clear demand and supply analysis. The authors of the report disagree that the hotel will be an attraction in the area and consider that the proposed hotel would result in a switch of trade away from existing suppliers of accommodation rather than introduce an increased demand for accommodation. The report identifies the following ways in which St Davids would be affected (while stating that forecasting is always difficult):

1. Premier Inn would undercut existing accommodation prices in the area, damaging livelihoods of those residents who currently run B & B’s and other accommodation in the area.

2. Harmful impact for the jobs and incomes of those who currently make a living serving the existing B& B’s and other accommodation.

3. A substantial amount of the area’s current tourist income would inevitably be transferred out of Pembrokeshire and back to shareholders in the Whitbread corporation.

The report also contests that the job numbers predicted by the applicant are incorrect as the amount of job displacement away from existing suppliers of accommodation is not considered and suggests that long term risks include the potential to deter future visitors and tourism to St Davids and the local area.

The applicant has responded to the Nopi Objection stating that they do not consider the hotel will lead to any significant job displacement as this is not the experience Premier Inn has had in the past. The applicant also states that Premier Inn is a branded serviced accommodation which attracts many visitors and that the strategy is not to compete on price with smaller independent businesses but to provide a complimentary offer.

The application has been assessed by the Tourism and Economic Development Officers at Pembrokeshire County Council who focused solely on the hotel element and advised that it is not possible to arrive at a definite conclusion and made the following comments:

‘The two extreme scenarios being:

a) A new Premier Inn hotel would attract many new visitors to the city without any noticeable impact on the number of visitors staying in established accommodation. These extra visitors would boost total visitor expenditure across a wide range of businesses.

b) The new Premier Inn would not bring any new visitors to the city but would simply take business from existing providers and not generate any extra visitor spend.

In practice the reality would fall somewhere between these two extremes but we are unable to say where on the scale this will be.

The response continues by stating:

‘In our opinion a new Premier Inn hotel will generate an unquantifiable increase in the number of visitors to St David’s and this has the potential to generate a degree of extra visitor spend in St David’s and the surrounding areas. The new hotel will also create new jobs combined with training which is to be welcomed and is a strategic fit with Welsh Government and Pembrokeshire County Council policies to encourage serviced accommodation.'
We anticipate that any threat to existing accommodation providers will focus mainly upon the lower cost sector but these providers can compete by raising standards especially around personalised service which the chain hotels are, in general, unable to provide.

Extra bed space in the off-peak seasons, will impact across the whole accommodation sector creating competition and reducing prices at certain times of the year. It is impossible to predict the extent of this competition or the full impact this will have on exiting accommodation providers either in the short or long term.

Should the proposed new hotel have significant impact upon existing accommodation providers this will ripple down to the supply chain. To some, but an unknown extent, the effects of this may be offset by new opportunities arising from any increase in visitor numbers using other facilities in the city, e.g. more visitors eating out in restaurants, tea-rooms etc.

The hotel also proposes a 43 cover restaurant and concern has also been raised in respect of the impact of this element of the development on local economy. The applicant has advised that 70% of Premier Inn customers eat and drink elsewhere when staying at Premier Inn hotels in Wales. The proposed hotel has a small restaurant area designed to cater primarily for guests’ breakfasts, whilst also serving light meals in the afternoon and evening. The applicant considers that existing restaurants etc. are likely to benefit from the increase in trade from the additional visitors.

Whilst it is difficult to accurately forecast the future economic impacts of the proposed development, it will result in an increase in accommodation to the area both residential and tourist, which having reviewed both arguments and taking into account the Views of the Tourism and Economic Development officers at PCC is considered to likely result in some economic benefits to the area. Members are reminded that they must to consider the hotel element of this application in terms of its land use only. The identity of the the proposed operator of the hotel is not a relevant consideration in determining the application.

Highways:

A number of the objections received are in relation to highway and pedestrian safety, and parking provision.

The application site will be accessed in the main by two separate accesses off Glasfryn Road, one serving the hotel development and the other serving the residential development. Access to 10 of the proposed dwellings will be gained from Fishguard Road to the north. There are a number of pedestrian access points along both the northern and eastern boundaries creating access to existing footpaths. The City centre is located 900m (13.5 minute walk) from the site.

The application was accompanied with a Transport Assessment, which has been considered together with the plans by the Highway Authority.

The majority of the proposal is served off the recently improved Glasfryn Road which gives vehicles the opportunity to travel south east or north east without the need to drive through the City, whilst also linking into existing walking infrastructure, including to the nearby City centre and bus services.
Further active travel improvements are to be provided which will improve walking opportunities for future residents and hotel guests. These works include improvements to the Public Right of Way to the north of Glasfryn Road, a short stretch of new footway along the B4583 and improvements to public footpaths PP86/144, 145 & 159 to the north west of the site. It is recommended that these improvements are secured through financial contribution via a legal agreement.

Limited access to public transport is already possible from the site and a financial contribution towards bus stop facilities and bus subsidies will be sought through a legal agreement to improve this situation.

In respect of the internal site layout, the site achieves a 20mph design speed, incorporates good pedestrian connectivity north/south and the level of parking provision is considered acceptable. Disabled parking spaces are provided within the hotel and residential areas with the proposed parking spaces measuring 2.6m in width. A number of these spaces are located side onto open areas and pathways to allow for disable access. The applicant has confirmed these spaces are compliant with DQR standards.

Concerns were also expressed by objectors about HGV movements to and from the site during the operational phase. The applicant has indicated that the development will generate very few HGV movements on the highway and the Highway Authority has not objected to the development.

During the Committee site visit a query was raised in respect of coach parking, to which the applicant has responded that it is not standard practice to make provision for coach parking in new Premier Inn developments as the hotels are not actively marketed to coach / group holidays. Standard procedure for guests seeking to book more than five bedrooms at Premier Inn hotels is for prior arrangement to be made directly with the hotel manager.

Having regard to the above, the proposed development has been assessed in terms of its impact on highway and pedestrian safety and parking provision by the Highway Authority and it is considered acceptable, subject to conditions and a legal agreement.

Ecology:

The application site is located approximately 120m from the boundary of the North West Pembrokeshire Commons Special Area of Conservation (SAC) with public access and Waun Fawr, Ty Ddewi Site of Special Scientific Interest (SSSI). Further information has been received in respect of surface water plans for the whole site, and is being consulted on at the time of writing the report. This information is required in order to carry out an appropriate assessment under the Conservation of Habitats and Species Regulations 2017, which must be found acceptable prior to determination.

The development proposes 70 residential units, which will be likely to result in increased pressure on the SAC from dog walkers. The increased pressure can, however, be off-set by the provision of interpretation boards at the entrance to the SAC, to advise the dog walkers of the implications of not picking up dog waste, and through the provision of dog waste receptors. This can be secured via a legal agreement.
The submitted Bat activity surveys showed limited use of the site by horseshoe bats, and it is therefore considered that any adverse effects can be avoided by retaining and enhancing existing hedgerows on site. In addition, effects can also be avoided with the provision of dark corridors on site, a sensitive lighting strategy is proposed on the site. A condition is recommended requiring the lighting strategy to be submitted prior to any construction works on site.

A condition requiring the submission of a Landscape and Ecological Management Plan (LEMP) is also recommended to ensure the on-going management of hedge banks and trees.

Having regard to the above, subject to an acceptable appropriate assessment, conditions and a legal agreement, the proposed development is considered acceptable in terms its impact on ecology.

**Drainage:**

Policy 29 of the LDP requires all development proposals to be well designed in terms of water and drainage (criterion ‘h’), Policy 32 requires development proposals to incorporate sustainable drainage systems for the disposal of surface water on site.

The application was accompanied by a drainage report for the site. Foul water is proposed to be collected via a new gravity sealed pipe system and connected into the existing public combined water sewer network which exists to the east of the site. Surface water run-off is proposed to be collected via a new gravity sealed piped network, discharging into the existing highway surface water system to the north of the site.

The proposed scheme has been assessed by the Drainage Engineers at Pembrokeshire County Council and is considered to be acceptable.

The scheme has also been considered by Dwr Cymru/Welsh Water which advised that the applicant actively engaged with it prior to the submission of the application in respect of waste water and water supply.

With regard to waste water, Dwr Cymru/Welsh Water has advised that the proposal would overload the existing Waste Water Treatment works, and so, reinforcements will be required to provide capacity for the development. The applicant has indicated that they will provide the financial contribution to enable the required reinforcements and this will form part of a legal agreement. Dwr Cymru/Welsh Water is satisfied with the scheme in respect of water treatment, sewerage, water supply and asset crossing subject to a legal agreement and a planning condition.

**Lighting:**

Policy 9 of the LDP relates specifically to light pollution and states that proposals that are likely to result in significant level of lighting shall include a full lighting scheme and will be permitted where the lighting relates to its 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.

It is noted that there are existing lighting columns along Fishguard Road, along GlASFryn Road, factory buildings and within the nearby housing development. Additionally the flood lights serving the rugby club are located to the north of the site.
Whilst there are a significant number of lighting columns and flood lights in the immediate vicinity of the site, the application does have the potential to exacerbate the existing light pollution situation to an unacceptable degree.

The residential elements will comply with the requirements of Pembrokeshire County Council in respect of the street lighting on adopted highways, with street lighting turned off after certain times.

Limited information has been submitted with the application for the hotel element in respect of lighting and a condition is recommended requiring the detail, locations and timings of any lighting proposed to be submitted and approved in writing by the local planning authority. The condition will also cover the residential elements of the development.

It is considered that the imposition of a lighting condition will address any concerns in respect of light pollution and impacts on ecology.

**Landscaping:**

The application site currently comprises fields with Pembrokeshire hedge banks bounding the site and separating the field parcels. There are 11 trees within the site, 5 of which are identified in the submitted Arboricultural Assessment as being of moderate quality and value.

The proposed scheme would result in the loss of 3 out of the 5 trees identified worthy of retention. Compensation for the loss of trees is proposed through the planting of a significant number of additional trees within the site. In order to ensure the replacement trees are of suitable species and size a condition is recommended requiring details of the trees to be submitted to and approved in writing by the local planning authority.

Whilst the proposal of additional trees is welcomed it is considered that additional planting should be carried out within the grounds of the hotel to soften its appearance along the north eastern corner. Consequently a condition is recommended requiring a scheme for further additional tree planting to be submitted.

In respect of Pembrokeshire hedge banks, the perimeter hedge banks will be retained and improved, other than where breaks are required to provide access, and where possible the internal hedge banks will also be retained.

In terms of the internal hedge banks the existing hedge bank along the eastern and southern boundaries of the proposed hotel will be retained, and additional hedge banks are proposed within the car parking area of the hotel to break up the hard landscaped area (similar to the Oriel y Parc car park).

The housing elements of the development seek to retain hedge banks where possible but will inevitably result in the loss of some within the site. To compensate for the loss, a significant amount of landscaping has been proposed in terms of tree planting, hedges and low level shrubs and trees.

A play area is proposed towards the southern end of the site and an area of open space proposed centrally within the residential area. Limited details of the play area have been submitted with the application so a condition is recommended requiring the detail of the play area to be submitted.

Having regard to the internal landscape, the proposed development is considered to provide a level of landscaping which is in excess of what is normally provided by

Pembrokeshire Coast National Park Authority
Development Management Committee – 6th June 2018
housing developers and will result in a development of high quality acceptable within the National Park.

In respect of the hotel element, the Tree and Landscape Officer assessed the scheme as originally submitted and requested additional landscaping to the car parking area and the hedge banks. An amended plan was submitted which adequately addressed the concerns and the Tree and Landscape Officer is satisfied with the revised scheme subject to a condition.

**Historic Environment:**

The application site lies within the registered Historic Landscape of St Davids Peninsular and Ramsey Island and specifically within the historic character of Warpool. The proposal is also approximately 500m away from the Grade I listed Cathedral of St Davids and associated Scheduled Ancient Monuments.

St Davids conservation area is located some 270m to the south west of the application site and given this distance the development is not considered to have an impact on the setting of the conservation area.

Dyfed Archaeological Trust has been consulted on the application but did not consider that the development would have a significant impact upon any buried archaeological resources, thus, historic environment mitigation was not required. This analysis was confirmed as the application was submitted with an Archaeological and Heritage Assessment which found that the development would have no direct or indirect impact upon designated heritage assets.

Cadw has also been consulted, however, at the time of writing the report a response had not been received, a verbal update will be provide at the committee meeting.

**Other material considerations:**

**Sandford Principle**

To assist National Park Authorities make decisions between conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as the 'Sandford Principle', named after Lord Sandford who was chair of the committee.

The Sandford Principle states that:-

"Where irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority"

This principle is expressed in statutory form in the Authority’s duty under the Environment Act 1995, as follows;

"If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area”.

For the reasons given above the proposed development is not considered to represent a development which there are irreconcilable conflicts. The development is on an allocated housing site in the adopted LDP within the City of St Davids and is considered acceptable in terms of its impact on the National Park.
Planning Obligations

The applicant is also required to make a contribution towards education provision and open space/community facilities in line with the Authority’s Planning Obligations SPG.

Conclusion

Following consideration of the policies contained within the Local Development Plan and National Planning Policy in the form of Planning Policy Wales (Edition 9, November 2016) and having regard to all material considerations it is considered that the proposal will be in keeping with the aims of the LDP in that the development is considered to provide new residential properties and a hotel, whilst sustaining the local character of the National Park and not impacting on privacy or amenity of neighbours. As such, and subject to S106 Agreements and a schedule of suitable conditions, the development is considered to be acceptable and complies with the requirements of policies 1, 5, 8, 10, 11, 15, 16, 29, 30, 31, 32, 34, 44, 45, 48, 52 and 53 of the adopted Local Development Plan.

Recommendation

That the application be delegated to the Chief Executive/Director of Planning / Team Leader to grant planning permission subject to the an acceptable appropriate assessment, conditions as outlined within the report and completion of S106 Agreements in respect of the heads of terms as set out below. The Section 106 legal agreements will be required within six months of the date of the meeting, and if not completed within this timeframe, officers will be able to use their discretion to refuse the application under delegation procedures as the proposal would be contrary to policies 1, 5, 8, 9, 10, 11, 12, 15, 29, 30, 32, 35, 44, 45, 48, 52 & 53.

S106 Requirements:-

1. 38 Affordable units to be provided on site, including the timing of their completion
2. Highways contribution towards active travel improvements and bus services
3. Planning Obligations (contributions towards education & open space provision)
4. Dwr Cymru/Welsh Water financial contribution towards reinforcements
5. Scheme for the provision of waste receptors and information boards including off site.

Conditions/Reasons

1. The development shall begin not later than five years from the date of this decision.
   
   **Reason:** Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:
   
   Drawing No: AP01A Site Location Plan (received 29th January 2018)
   Drawing No: AP09T Proposed site layout (received 29th January 2018)
   Drawing No: AP12 Proposed Floor & roof plan (received 29th January 2018)
   Drawing No: AP15 Proposed elevations (received 29th January 2018)
   Drawing No: AP16 Proposed elevations (received 29th January 2018)

Pembrokeshire Coast National Park Authority
Development Management Committee – 6th June 2018
3. Prior to any construction works commencing on site a detailed lighting plan covering the entire site shall be submitted to and agreed in writing by the Local Planning Authority. The lighting plan shall be implemented as approved and retained as such thereafter.

**Reason:** In the interests of Biodiversity and the Special qualities of the National Park. Policy: Local Development Plan Policy 8 (Special Qualities), 9 (Light pollution) and 11 (Biodiversity).

4. Prior to commencement of development on site, a Landscape and Ecological management Plan (LEMP) shall be submitted to and approved in writing by the Local planning authority. The LEMP shall be implemented as approved.

**Reason:** In the interests of protecting the visual amenity of the area, to maintain the special qualities of the landscape and habitats. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities).
Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity).

5. Prior to commencement of development on site, full details of the proposed vehicular and multi modal access including visibility splays, cross sections and details of surface water drainage shall be submitted to and approved in writing by the Local Planning Authority. Prior to first occupation the accesses shall be completed in all respects in accordance with the details approved and shall be retained as such thereafter.

**Reason:** To ensure adequate vehicular accesses in the interests of highway safety

**Policy:** Local Development Plan Policy 52 & 53

6. Prior to the commencement of development, a construction management plan, shall be submitted to and approved in writing by the Local Planning Authority. The construction management plan will detail how the site will be accessed, site accommodation and storage to be provided, wheel washing and details of phasing of the works. The plan shall be implemented as approved.

**Reason:** In the interests of highway safety

**Policy:** Local Development Plan Policy 52 & 53

7. The development hereby approved shall be served by an estate road laid out and constructed, including pedestrian crossing points and a means of surface water disposal, in accordance with the current Pembrokeshire County Councils Highways Requirements for Development and guidance contained within Manual for Streets, details of which shall be submitted to and approved in writing by the Local Planning Authority. Prior to first occupation the road will be brought up to base use level and prior to final occupation the road shall be surfaced to wearing course level.

**Reason:** To ensure an adequate access in the interests of highway safety

**Policy:** Local Development Plan Policy 52 & 53

8. No part of the completed development shall be used or occupied until the car parking area, access and turning areas have been completed and marked out in accordance with the approved plans. The car parking areas, accesses and turning areas shall thereafter be retained in accordance with the approved plans and available for use as car parking and turning.

**Reason:** To ensure adequate car parking and turning within the site, in the interests of highway safety

**Policy:** Local Development Plan Policy 52 & 53

9. No development, demolition or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme relating to the immediate landscape. The approved scheme shall include the following details:

**Hedgebank Protection:**
- Areas of existing landscaping, hedges and hedgebanks protected from construction, with detail of protection fencing and ground protection type specified (type justified where necessary)
- Construction Exclusion Zone (CEZ) for hedgebanks and hedges identified on scale plan together with ustification of any identified CEZ offsets
- Justification of any identified Root Protection Area (RPA) offsets
Arboricultural Method Statement (AMS) - including details of:

- Implementation of any geotextile materials including cross sections and clarification of suitability to proposed use
- Any foundation design within RPA of any retained trees and Pembrokeshire hedgebanks including:
- Implementation method of any proposed hard surfaces (i.e. parking areas) and surfaced access routes (including vehicle & pedestrian)

Pembrokeshire hedgebank implementation details including:

- Any proposed hedgebank breaches - locations identified and mitigation provided
- Method statement for any proposed hedgebank relocations
- Details of finishes to any hedgebank breaches and any proposed hedgebank improvements
- Scaled cross section of all new hedgebank details

Proposed landscaping details including:

- Implementation programme / timescale / phasing of planting
- Management and replacement of failures details

Hard Landscaping

- Details of material for hard landscaping throughout entire site

**Reason:** In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity).

10. Prior to the construction of the hotel details of the plant machinery shall be submitted to and approved in writing by the local planning authority. The plant machinery shall be constructed as approved.

**Reason:** In the interest of amenity. Policy: Local Development Plan Policy 30 (Amenity)

11. Prior to the construction of the buildings hereby approved details and/or samples of the materials to be used in the construction of the external surfaces of the buildings shall be submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.

**Reason:** To ensure a proper standard of development and appearance in the interests of conserving the amenities and special qualities of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 15 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

12. No development shall commence on site until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface and land water and include as assessment of the potential to dispose of surface and land water by sustainable means. The scheme shall provide for the foul only flows from the development to be communicated to the public foul only sewer at manhole SM75257871. Thereafter the scheme shall be implemented and retained as...
approved prior to the first occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

**Reason:** To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of detriment to the environment. Policy: Local Development Plan -29 (Sustainable Design).

13. Prior to the occupation of the dwellings hereby approved a plan indicating the positions, height, design, materials and type of boundary treatment to be erected shall be submitted to and approved by the local planning authority. The boundary treatment shall be completed as approved before the use is before the dwellings are first occupied.

**Reason:** In the interest of maintaining a satisfactory scheme of landscaping and to protect the visual amenity of the area. Policy: Local Development Plan - Policy 15 (Conservation of the Pembrokeshire Coast National Park).
1. 38 NO. HOMES FOR SOCIAL RENT (FULL)
   © LA Architects Ltd

2. 32 NO. PRIVATE FOR MARKET RESIDENTIAL (OUTLINE)
   © LA Architects Ltd

3. 63 NO. BED HOTEL (FULL)
View from the junction of A467 and Glasfryn Road
View 02 - Proposed - Summer Trees (Site Only)

View from corner of A487 and Glasfryn Rd, Looking SW
View 03 - Proposed - Summer Trees (Site Only)

View from Glasfryn Rd, Looking N
View 05 - Proposed - Summer Trees (Site Only)

View from Corner of B4583 and Pen Rhiw, Looking SE