Application Ref: NP/18/0747/FUL

Case Officer: Andrew Richards
Applicant: Jones Brothers (Henllan) Ltd & Ateb Group
Agent: Mr R Bowen, Asbri Planning Ltd

Site Location: Former Printing Factory, Knowling Mead, Tenby, Pembrokeshire, SA70 8EB

Grid Ref: SN12150071
Date Valid: 21-Jan-2019  Target Date: 17-Mar-2019

This application has been reported to the Development Management Committee as the application is classed as major development.

Consultee Response

Tenby Town Council: No response received to date.
PCNPA Tree and Landscape Officer: Conditional consent
PCNPA Planning Ecologist: Conditional consent
PCNPA Park Direction: Support
PCNPA Access Manager: No public rights of way affected
PCC Transportation and Environment: No response received to date.
PCC Drainage Engineers: Conditional consent
PCC Public Protection: Conditional consent
Natural Resources Wales: No objection
Dwr Cymru Welsh Water: No response received to date.
Tenby Civic Society: Concerns raised

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

No responses in writing have been received. However, officers have had a telephone conversation relating to the existing trees within the site and concerns were raised in relation to the trees having an adverse impact on amenity to neighbours.

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

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LDP Policy 02 - Tenby Local Service and Tourism Centre
LDP Policy 08 - Special Qualities
LDP Policy 11 - Protection of Biodiversity
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 16 - Open Space and Green Wedge
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 42 - Employment Sites and Live/Work Units
LDP Policy 43 - Protection of Employment Sites and Buildings
LDP Policy 44 - Housing
LDP Policy 45 – Affordable housing
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW10
SPG05 - Sustainable Design
SPG06 - Landscape
SPG08 - Affordable Housing
SPG12 - Parking
SPG20 - Accessibility
SPG23 - Enabling Sustainable Development in Welsh NPAs
TAN 02 - Planning and Affordable Housing
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 15 - Development and Flood Risk
TAN 16 - Sport, Recreation and Open Space
TAN 18 - Transport
TAN 23 - Economic Development

**Constraints**

LDP Open Space
LDP Centre: 60pc aff housing; 30 units/ha
Recreation Character Areas
Affordable Housing Submarkets

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Officer’s Appraisal

Background and History

The site comprises two separate areas, but both used as previous printing works and are accessed off Knowling Mead residential estate. There is a public footpath which is located to the east of the site and further residential sites are located to the east (St Davids Close) and north (Tudor Way) with an existing rugby pitch located to the west. The site levels are significantly lower than the adjacent Tudor Way residential estate and the road access into the site will be provided within the south eastern part of the site.

No previous planning history has been identified for this site.

Current Proposal

Planning approval is sought for the demolition of former Reeves Calendars & Five Arches Press Offices and the redevelopment of the site for 29 residential dwellings (Affordable Housing). The proposal also includes landscaping and associated infrastructure works.

Key Issues

The application raises the following planning matters:-

- Policy, Principle of Development and Impact on National Park
- Affordable Housing
- Siting and Sustainable Design
- Amenity and Privacy
- Highway Safety and Access
- Landscaping
- Biodiversity
- Land Drainage and Flooding
- Other Material Considerations

Policy, Principle of Development and Impact on National Park:

The site is within the Centre of Tenby, as defined in the Local Development Plan. Although it is surrounded by existing residential development the site is an employment site. Policy 42 of the Plan seeks to protect existing employment sites for employment uses except in locations where the current use is not suited to the area or where there is adequate provision already or the existing use is unviable. When considering a new use for a redundant employment site a community facility or affordable housing provision will be given priority. Policy 43 reinforces this policy position.

The changes in printing technologies over recent years have resulted in fewer print works throughout the UK so there is little chance of reopening these premises as

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print works as originally designed. Notwithstanding this in accordance with policy requirements the site has been marketed since mid-2016 with little or no interest given that both premises were purpose built for printing uses.

In addition to the existing challenging access arrangements the site and buildings themselves are deficient for commercial purposes in terms of acceptable on-site parking and servicing facilities as well as the buildings being of poor quality in terms of their thermal performance and they have been poorly maintained. This is reflective of the lack of any interest for other commercial uses.

Having regard to the evidence submitted in the form of correspondence from local estate agent and the comments from the Economic Development officer at PCC, it is considered that the application demonstrates the site is no longer required for employment purpose and a community facility or affordable housing provision should therefore be given priority. As such, the principle of its redevelopment for 100% affordable housing provision is acceptable.

Planning Policy Wales 10 (PPW 10) highlights the need for good design, ensuring the requirements set out in Policy 15 of the Local Development Plan are met. In addition, PPW10 places greater emphasis on “avoiding the creation of car based developments.” Paragraph 4.1.10 states:

“Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services.”

Paragraph 4.1.13 states that the sustainable transport hierarchy set out in Figure 8 of the document must be a key principle when determining planning applications. The proposal will therefore need to prioritise walking, cycling and public transport access ahead of private motor vehicles.

The application includes information within the Design and Access Statement that confirms that the site is within close proximity of public transport facilities and local facilities. As such, it is considered to have a sustainable location as required within PPW 10 and is acceptable in terms of LDP policy.

The site is located in an area which is well screened by the adjacent topography and existing development and will not have any significant adverse impact on the wider landscape of Tenby and its special qualities.

**Affordable Housing:**

The application site is located within Tenby Centre and the Authority’s adopted Supplementary Planning Guidance on affordable housing requires residential developments in the area of the application site to provide 30% of the units as affordable units. In this instance the applicant is a registered social landlord and the site will be 100% affordable units. The affordable housing requirement in line with the SPG will be secured via a S106 legal agreement.

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Siting and Sustainable Design:

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a', 'b' and 'd' resisting development that would cause significant visual intrusion, be insensitively and unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park. Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a').

The submitted details indicate a residential layout which has benefitted from pre-application advice for the redevelopment of the existing site into 29 new dwellings proposed off a central sweeping access road. The layout also ensures that all the new dwellings are located at appropriate distances away from adjacent existing dwellings, and this together with orientation, topography and landscaping features result in the visual impact from the development, its siting and proposed layout being acceptable in this instance.

The proposed dwellings are simply designed to reflect the location and existing character of this area of Tenby with key features of the design being neutral rendered external finishes and simple pitched roofs. Windows will be provide in Upvc with brick details for plinths with the roof covered in slate grey concrete tiles and contrasting ridge tiles to match other dwellings within the area.

The proposed method of construction will be sustainable in nature and include high energy performing fabric to ensure buildings are well insulated and energy efficient. As such, the proposal is considered to be acceptable in sustainable design terms.

Amenity and Privacy:

Policy 30 of the LDP states that development will not be permitted where it has an unacceptable impact on amenity. The proposed layout of the site locates two of the new dwellings some 17 metres away from the adjacent neighbouring dwellings. However, given the sites topography, scale of the two new dwellings (single storey) and the proposed boundary treatment of a close boarded timber fence, there is not considered to be any significant impact on amenity or privacy to neighbouring properties. Furthermore, the fall-back position of this site is commercial development in a residential area, which would have a greater impact on residential amenity in terms of noise and general disruption that the residential development proposed. As such, the proposal can be supported in terms of Policy 30 of the LDP.

Highway Safety and Access:

Pembrokeshire County Council Transportation and Environment section has indicated that they support the proposed scheme subject to planning conditions to ensure a Construction Traffic Management Plan is provided and agreed, off-street parking facilities are provided prior to first occupancy and access roads and Pembrokeshire Coast National Park Authority Development Management Committee – 6th March 2019 Page : 40
footpaths are provided. In addition they have also requested a contribution of £8,700 towards footpath improvements adjacent to the site. This contribution will need to be secured through a Unilateral Undertaking.

*Landscaping:*

The existing site has a mixture of trees, hedges and hard landscaped areas. The proposal seeks to retain the existing treatments along the northern and western boundaries and other sections of existing hedgerow on the southern and eastern boundaries.

Within the site there are areas proposed to be laid to lawn but no other soft landscaping details have been submitted in support of the application. The addition of trees located in appropriate formal locations within the plot frontages is considered to be necessary to address the loss of the existing trees to be removed from the existing site and assist in soften the visual appearance when viewing the development from the new access road.

In addition no details have been received to support the removal of the existing trees, tree protection measures and a tree survey. These details would be secured and agreed through appropriate planning conditions.

*Biodiversity:*

A Preliminary Ecological Appraisal and Bat Survey have been undertaken and submitted in support of the proposed development. The survey report concludes that the site is of low ecological value, consisting of hard standing, buildings, rank semi improved grassland, scrub and hedge. No evidence of protected species was recorded and no priority habitats found on site.

A bat survey was also undertaken during August 2017. No bats were recorded roosting in the buildings although suitable features are present across the site. The activity surveys recorded low numbers of bats with some foraging across the site. The report proposes enhancement in the form of bat boxes on the proposed new dwellings. This would be secured by condition.

The report is not conclusive as to the presence of reptiles, stating there are suitable habitats but no further survey work has been undertaken. Given the habitats present on the site it is considered that reptiles are likely to be present and the clearance of the site may result in disturbance and harm. To reduce the potential impact a Reptile Mitigation Strategy would be required, including details setting out method and timing of works, trapping, relocation and clearance. This would be secured via planning condition and details submitted and agreed in writing prior to the commencement of any works on site with all works undertaken to be carried out in accordance with the agreed strategy.
Drainage and Flooding:

PCC Drainage Engineers support the application subject to the discharge of surface water being directed to new soakaways or other forms of sustainable drainage systems. If, however, ground conditions are not suitable for the use of soakaways/infiltration type SuDS, an alternative method of disposal will be required, which should be agreed in writing with the local planning authority.

Dwr Cymru Welsh Water has not responded on the application to date and a further verbal report will be given at the meeting.

Other Material Considerations:

PCC Public Protection section have indicated that the historic use of the site as print works has resulted in contamination being found on the site. The preliminary geo-environmental assessment included a limited intrusive investigation of external areas only. The investigation was limited to hand dug and trail pits. The supplementary investigation included assessment underneath the two building footprints.

The Pollution Control Team is in general agreement with the conclusions of both reports. However, there are several elements that remain outstanding and further investigation will be required to ensure risks posed to human health and controlled waters are fully understood. Therefore, it is essential that this is undertaken to ensure appropriate remedial measures can be undertaken in the interest of protecting human health.

The additional investigations, detailed remedial scheme, implementation of remedial scheme, other contamination identified during construction phase and asbestos survey and details for removal of material would be secured through appropriate planning conditions in this instance.

Conclusion

Following consideration of the policies contained within the Local Development Plan and National Planning Policy in the form of Planning Policy Wales (Edition 10, December 2018) and having regard to all material considerations it is considered that the development will be in keeping with the aims of the LDP in that the development is considered to provide new residential properties whilst sustaining the local character 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, 2, 8, 11, 15, 16, 29, 30, 31, 32, 33, 42, 43, 44, 45, 52 and 53 of the adopted Local Development Plan.

Recommendation

A further verbal report will be given on receipt of the outstanding consultation with Tenby Town Council and Dwr Cymru Welsh Water.

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Subject to no material objections arising from those outstanding consultations, the recommendation is that the application be delegated to the Chief Executive / Director of Planning / Team Leader to grant planning permission subject to the conditions as outlined within the report and completion of the S106 Agreements in respect of the provision of affordable housing and footpath improvements within 3 months of this meeting. The Section 106 legal agreements will be required within three months of the date of the meeting, and if not received within this time, officers will refuse the application on lack of affordable housing and footpath improvements given no compliance with policies 45 and 53 of the LDP under delegation procedures.

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 Reference: 1833/01 (Received 21.12.2018)
   - Drawing Reference: 1833/05/D (Received 16.01.2019)
   - Drawing Reference: 1833/06/C (Received 21.01.2019)
   - Drawing Reference: 1833/07/C (Received 21.01.2019)
   - Drawing Reference: 1833/08/C (Received 21.01.2019)
   - Drawing Reference: 1833/09/C (Received 21.01.2019)
   - Drawing Reference: 1833/10/C (Received 21.01.2019)
   - Drawing Reference: 1833/11/B (Received 22.01.2019)
   - Drawing Reference: 1833/12/B (Received 21.12.2018)
   - Drawing Reference: 16011/01/P2 (Received 16.01.2019)
   - Drawing Reference: 16011/03/P1 (Received 16.01.2019)
   - Drawing Reference: 16011/04/P2 (Received 16.01.2019)
   - Drawing Reference: 16011/08/P3 (Received 16.01.2019)
   - Drawing Reference: 16011/09/P3 (Received 16.01.2019)
   - Pre-Application Consultation Report (Received 21.12.2018)
   - Planning Statement (Received 21.12.2018)
   - Design and Access Statement (Received 16.01.2019)
   - Traffic Management Plan (Received 21.12.2018)
   - Preliminary Geo-Environmental and Geotechnical Assessment (Received 21.12.2018)
   - Supplementary Soakaway Investigation and Ground Water Monitoring (Received 21.12.2018)
   - Drainage Strategy (Received 21.12.2018)
   - ESI – Investigation Point Plan and Findings (Received 21.12.2018)
   - DETS Certificate of Analysis (Received 21.12.2018)
   - Tree Survey Report (Received 21.12.2018)
   - Hedge Survey (Received 21.12.2018)
   - Japanese Knotweed Report (Received 21.12.2018)
   - Bat Survey Report (Received 21.12.2018)

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3. The development shall utilise soakaways/infiltration type SuDS to dispose of surface water. If, however, ground conditions are not suitable for the use of soakaways/infiltration type SuDS, an alternative method of disposal will be required, which shall be agreed, in writing, with the local planning authority. The development shall be carried out in accordance with the approved details. **Reason:** To ensure that effective drainage facilities are provided for the proposed development and that no adverse impact occurs to the environment or the existing public sewerage system. Policy: Local Development Plan – Policy 29 (Sustainable Design).

4. Prior to the construction of the dwellings hereby approved details of the external finishes and colours 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).

5. The Construction Traffic Management Plan shall be fully implemented prior to commencement of the development and kept in place for the duration of the construction works. **Reason:** To ensure adequate and safe access is achieved during the construction period. Policy: Local Development Plan - Policy 53 - Impacts on Traffic.

6. The off-street parking facilities (for all vehicles, including cycles) shown on the plan hereby approved shall be provided before the building is first occupied, and thereafter retained for that purpose. **Reason:** To ensure the satisfactory provision of parking facilities and in the interest of highway safety and the amenity of the area. Policy: Local Development Plan - Policy 53 - Impacts on Traffic.

7. Before any dwelling is occupied the access roads and footways from the existing public highway shall be laid out and constructed to at least surface base course levels up to that dwelling. **Reason:** In the interests of public amenity and convenience. Policy: Local Development Plan - Policy 53 - Impacts on Traffic.
8. No development shall commence until an assessment of the nature and extent of contamination affecting the application site area has been submitted to and approved in writing by the local planning authority. This assessment must be carried out by or under the direction of a suitably qualified competent person *in accordance with BS10175 Investigation of Potentially Contaminated Sites Code of Practice and shall assess any contamination on the site, whether or not it originates on the site. The report shall address outstanding issues and shall include:
   An assessment of the potential risks to groundwater and surface waters; and
   an appraisal of remedial options, and justification for the preferred remedial option(s).

All work and submissions carried out for the purposes of this condition must be conducted in accordance with Welsh Local Government Association and the Natural Resources Wales ‘Development of Land Affected by Contamination: A guide for Developers’ (2012).

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Policy: Local Development Plan – Policy 30 (Amenity) and Planning Policy Wales (Edition 10, December 2018) – Chapter 6 (Distinctive and Natural Places).

9. A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990, The Contaminated Land (Wales) Regulations 2012 in relation to the intended use of the land after remediation. The detailed remediation scheme should not be submitted until written approval for Condition 8 has been received from the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Policy: Local Development Plan – Policy 30 (Amenity) and Planning Policy Wales (Edition 10, December 2018) – Chapter 6 (Distinctive and Natural Places).

10. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

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Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority. The verification report contents must be agreed with the Local Planning Authority before commencement of the remediation scheme.

**Reason:** To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Policy: Local Development Plan – Policy 30 (Amenity) and Planning Policy Wales (Edition 10, December 2018) – Chapter 6 (Distinctive and Natural Places).

11. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 8, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 9, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 10.

**Reason:** To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Policy: Local Development Plan – Policy 30 (Amenity) and Planning Policy Wales (Edition 10, December 2018) – Chapter 6 (Distinctive and Natural Places).

12. No development shall commence until the developer submits evidence that the building was built post 2000 or a full asbestos survey (in accordance with HSG264) of buildings to be demolished has been submitted to and approved in writing by the Local Planning Authority. Development shall not be carried out other than in accordance with the approved details.

**Reason:** To ensure that risks from asbestos to the environment, future users of the land and neighbouring land are minimised, to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors. Policy: Local Development Plan – Policy 30 (Amenity) and Planning Policy Wales (Edition 10, December 2018) – Chapter 6 (Distinctive and Natural Places).

13. No development shall take place until a Reptile Mitigation Strategy has been submitted to and approved in writing by the local planning authority. The Reptile Mitigation Strategy shall include:
   - Details setting out method and timings of works;
   - Trapping;

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Relocation and clearance
The Reptile Mitigation Strategy shall then be implemented in accordance with the details approved by the local planning authority.

**Reason:** To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2010 are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity) and 15 (Conservation of the Pembrokeshire Coast National Park).

14. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (relating to extensions to, and changes to the external appearance of, the dwelling and to development or the siting of a caravan within the curtilage of the dwelling house), no development of Parts I, 2 and 5 of Schedule 2 to that Order (or any Order revoking or re-enacting that Order) shall be carried out without specific planning permission being obtained.

**Reason:** To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

15. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (or any Order revoking or re-enacting that Order) any electricity or telephone supplies to the site shall be by underground cables.

**Reason:** To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty) and 15 (Conservation of the Pembrokeshire Coast National Park).

16. 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 landscape. The approved scheme shall include the following details:
   - Initial tree, hedge and hedgebank Information;
   - Proposed site specific tree, hedge and hedgebank work;
   - Tree, Hedge and Hedgebank Protection;
   - Arboricultural Method Statement (AMS);
   - Any foundation design within RPA of any retained trees;
   - Pembrokeshire hedgebank implementation detail; and
   - Proposed landscaping details.

An informative has been attached to provide further guidance on the exact information required for the subsequent discharge of the landscaping scheme. The development shall be carried out in accordance with the approved details.

**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) and 30 (Amenity).
Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

Notes
This consent is subject to legal agreements
The crossing of the Highway verge/footway requires further consent from the Highway Authority under Section 184 of the Highways Act 1980, and that working in the Highway must be done by an approved contractor. Please refer to the attached letter from Pembrokeshire County Council Streetcare and Parking Manager.
The applicants attention is drawn to the attached Dwr Cymru Welsh Water Consultation Response.
The applicants attention is drawn to the attached PCNPA Tree and Landscape officers consultation response.