

# PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



**Ref No:** NP/24/0514/FUL

**Proposal:** Demolition and replacement of public convenience block, creation of access ramp and steps to south slip way, erection of beach wheelchair storage building, new surfacing and parking bay formation existing car park, information signage, pay & display machine/s and new raised planters

**Site Location:** Newport Sands PCNP Car Park, Golf Course Road, Newport

**Recommendation:** Approve, subject to conditions

**This application is being presented to the Development Management Committee in accordance with the adopted scheme for Delegation as the National Park Authority own the land subject to the application.**

## **Summary:**

This report recommends approval for the resurfacing and reconfiguration of Newport Sands car park, to enhance existing facilities and improve the management of traffic flow at the site.

Traeth Mawr / Newport Sands Car Park is located on the northern side of the National Park, just under a mile away from the south-east of Newport. The beach forms part of the estuary mouth of the Afon Nyfer, and there are attractive unspoilt coastal views along the shoreline, especially to the north along the beach to the headland.

The proposal will result in improved and enhanced services for visitors to the Newport Sands car park by providing better beach access, clearly laid out parking bays and pedestrian zones, improved public convenience facilities, and landscaping enhancements across the site. The provision of a changing places facility, beach wheelchair storage and new access ramp are likely to assist in enhancing access for wheelchair users to this site.

The site is constrained by several environmental spatial factors due to its proximity to the beach foreshore, West Wales Marine Special Area of Conservation (SAC), and the Newport Cliffs Special site of Scientific Interest (SSSI). As the proposals are not to extend the used space, but to upgrade and replace existing infrastructure and surfaces, it is considered by officers that any cumulative affects as a result of the development to the SAC and SSSI can be mitigated through a Construction Environment Management Plan (CEMP). This will be subject to further consultation with the Authority's Ecologist and Natural Resources Wales (NRW), prior to the commencement of any works on site.

Overall, officers consider that the proposals are acceptable and that the scheme as a whole protects the special qualities of the National Park whilst delivering appropriate enhancements to this important community facility. No objections to the proposal have been received, however, one third-party representation has been received in relation to the application which has been addressed within the report. As such, it is considered that the development complies with the relevant policies of the Local Development Plan 2 and can be supported subject to appropriate conditions.

The full application documents can be viewed on-line at: [Citizen Portal Planning - application details \(agileapplications.co.uk\)](http://Citizen Portal Planning - application details (agileapplications.co.uk))

### **Consultee Response**

- **Community Council** – Further information requested - supplied by officers
- **CADW - Protection & Policy** - No response received at the time of writing
- **Dwr Cymru Welsh Water** – No objection
- **Natural Resources Wales** – Conditional consent
- **PCNPA - Planning Ecologist** – Conditional consent
- **PCNPA - Estates Officer** – No formal response received at the time of writing
- **PCNPA - Tree and Landscape Officer** – Conditional consent
- **PCNPA - Access Manager** – Conditional consent
- **PCC - Drainage Engineers** – Conditional consent
- **PCC - Coastal and Rivers Engineer** – No objection
- **PCC - Area Health and Safety Officer** – No response received at the time of writing
- **PCC - Transportation & Environment** – Conditional consent
- **PCC - Public Protection** – No objection

### **Public Response**

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

One third-party response was received during the course of the application which raised concerns in relation to the proposed Pay & Display machines and their specification.

### **Policies considered**

#### **National Policy**

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

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

#### **Technical Advice Notes**

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

[www.gov.wales/technical-advice-notes](http://www.gov.wales/technical-advice-notes):

- TAN 5 – Nature Conservation and Planning
- TAN 12 – Design
- TAN 14 – Coastal Planning
- TAN 15 – Development and Flood Risk

#### **Local Development Plan 2 (Adopted September 2020)**

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

- Policy 01 (National Park Purposes and Duty)
- Policy 07 (Countryside)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 34 (Flooding and Coastal Inundation)
- Policy 54 (Community Facilities)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

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

### LDP2 Supplementary Planning Guidance

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

- SPG – Biodiversity
- SPG – Landscape
- SPG – Parking Guidelines
- SPG – Sustainable Design & Development
- SPG – Seascape Character

### Constraints

- Technical Advice Note 15 - C2
- NPA Property - within 25m
- Site of Special Scientific Interest - within 50m
- Biodiversity Issue
- ROW Coast Path - within 10m
- NPA Foreshore - within 25m
- Potential for surface water flooding
- Recreation Character Areas
- Affordable Housing Submarkets
- Seascape Character Areas
- Landscape Character Area

### Relevant Planning History

- NP/20/0015/FUL - Newport Sands Car Park, Newport - Installation of Pay & Display ticket machine & sign – Approved May 2020

## 1. Officer's Appraisal

### **Site and Proposed development**

The application site is owned and operated as a public car park by the Pembrokeshire Coast National Park Authority and is located adjacent to the popular Newport Sands Beach. The car park is currently accessed off a single lane road that leads down onto Newport Beach. There are currently two car park enclosures in total, both operated by the Pembrokeshire Coast National Park Authority and located on either side of the single lane road that leads down to the beach. The car park that forms part of this application is located on the southern side of the road and is primarily enclosed by a grassed earthbank. Whilst the car park to the north has a tarmac surface finish with delineated parking bays, the southern car park has a gravel surface finish. Located within the southern car park are Public Toilets. There is a further building to the west of the toilets which houses a beach shop and Newport Surf Life Saving Club. Newport Golf Club is located to the east which overlooks the application site and Newport Sands Beach.

### **Current Proposal**

Planning permission is sought for resurfacing and reconfiguration of Newport Sands car park, to enhance existing facilities and improve the management of traffic flow at the site. Namely: the proposal comprises:

- Reconfiguration of the existing open plan layout of the car park to formalize car parking spaces
- Resurfacing of existing gravel car park to Perfo with stone fill.
- Demolition and replacement of the existing public convenience block, which will support unisex and disabled toilets, with a disabled changing room.
- Interpretation panel and H2O station positioned on the new toilet block.
- Creation of access ramp and steps to south slip way
- Erection of beach wheelchair storage hut
- Electric bike charging point
- Picnic areas
- 2no. pay and display machines
- New raised planters

The car park will provide an additional 52 car parking spaces to complement the 43 standard spaces already offered in the tarmacked section of the car park. Additionally, 3 disabled parking spaces will be added which will complement the 6 spaces already available at the site, but these may change slightly subject to a revision expected prior to the date of Committee which will be verbally reported to Committee.

## 2. Key Issues

The application raises the following planning matters:

- 2.1 Policy and Principle of Development
- 2.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 2.3 Amenity and Privacy

- 2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 2.5 Access and Parking
- 2.6 Surface Water Drainage
- 2.7 Other Material Considerations

## 2.1 Policy and Principle of Development:

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

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

On page 104, Future Wales states that: '*National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...*'.

The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental, and cultural well-being of Wales, as required by the *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty.

A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.

Policy 1 of the Pembrokeshire Coast National Park Local Development Plan (LDP2) sets out the National Park's purposes and duty and is the overarching policy which ensures that development within the National Park is compatible with a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and b) the public understanding and enjoyment of the special qualities. The Sandford Principle asserts primacy to the first purpose - of conservation and enhancement, in cases of obvious conflict.

Newport Sands Car Park is located within open countryside as defined by the LDP2 Policy 7 (Countryside). Outside the identified Centres of the LDP2 development will only be permitted where: criteria e) the enhancement of community facilities is proposed. The proposed alterations to the car park will provide enhanced community facilities for visitors in connection with Newport Sands beach and is therefore considered to be justified in relation to its need within a countryside location.

Policy 54 (Community Facilities) of the LDP2 states that new and extended facilities will be permitted where they are well located to meet the community's needs, and they are convenient to public transport, shops and other services where this is required to serve the needs of the user. Whilst the car park is located outside the local centre for Newport, by reason of its purpose and definition, the car park is an important community facility which serves the needs of local residents. Notably, the proposed scheme will enhance existing access to the beach front, providing a wheelchair storage and access, with steps to the southern slip way.

The enhancement of community facilities, where there is no harmful impact on the surrounding landscape, road safety or environmental matters can be supported, and this particular development will improve a facility in terms of layout and appearance and will increase the quality of the facility offering to the public. The development will formalize the existing, open-plan, gravel section of the car park, designating a total of 55 parking spaces of higher quality while also improving the disabled parking offering, with further support for electric bike charging.

As a result, there is sufficient justification for the proposed works which will provide an improvement for users of the car park and also pedestrians and it is not considered that the proposed works will have a detrimental impact on the special qualities of the National Park. As such, the development complies with policies 8, 14 and 29 of the LDP2 and can be supported.

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

Policy 08 (Special Qualities), of LDP2, is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique.

Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.

Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.

The application site is situated within Landscape Character Area LCA23: Newport, and the Seascape Character Area of Newport Bay SCA4, as defined by the adopted Landscape and separate Seascape Character Supplementary Planning Guidance (SPG).

The Newport Sands Car Park is located within an exposed part of the landscape with the topography of the area rising gradually from the beach inland to the east. As a result, the site is within clear public view from several vantage points such as, Newport Sands Beach, the Pembrokeshire Coast Path which runs through the site and from the Newport Sands Golf Club which has elevated views over the car park.

The reconfiguration of the car park is considered to improve traffic flow, and the re-surfacing will provide clearer directions for users of the car park while not having a significant visual impact on the surrounding area. Although the site occupies a relatively large area of hard landscaping, it is welcomed that an attempt has been made to soften its appearance through the siting of planters and native planting.

The proposed public access ramp and steps would be positioned to the west of the car park and visible from the beach. The ramp would be set in place of an existing slipway and would be constructed to a gradient of 1:20. The works will not be out of keeping with the car park or beach and would be seen in conjunction with the adjacent slipway already serving the lifesaving building to the north. As such, the visual impact will be minimal in the context of wider views.

The replacement toilet block will be slightly larger in footprint than the existing building and is proposed to be finished in vertical timber clad with a natural slate roof over. The new toilet block has been designed to reflect the vernacular of the surrounding area using both natural materials and following the roof scape pattern of the Newport Surf Life Saving building. Consequently, it is not considered that the new building will appear as a visual intrusion within the landscape.

The lean-to beach wheelchair storage hut is also sensitively designed with natural materials throughout, set back from the beach and adjacent to the proposed beach access ramp for better accessibility for wheelchair users. Therefore, the wheelchair storage hut is considered a positive new facility to be introduced within the location.

The limitation to only 2 no. Pay & Display machines will also ensure clutter is kept to a minimum.

Overall, the scheme as a whole is considered to greatly enhance both the visual quality and facilities offering in this area of the National Park. The design of the surfacing, specified materials, landscape detailing, and physical betterment of the existing public conveniences is considered a substantial improvement to the visual quality of the site. Natural timber features, native planting, a range of complimentary surface treatments and introduction of natural cladding with slate roof to the existing public conveniences building is considered sensitive and positive design.

The development will positively improve the character and appearance of the application site and enhance the special qualities of the National Park. As such, the development complies with Policies 8, 14 and 29 of the LDP and can be supported.

### 2.3 Amenity and Privacy:

Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:

- a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
- b) the development is of a scale incompatible with its surroundings; and/or

- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
- d) the development is visually intrusive.

Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.

The development is within a self-contained site, away from residential dwellings, and will benefit the amenity, safety and enjoyment of its users. The development is not considered to cause any further adverse impact on the privacy or amenity of surrounding residential properties than is already caused by the existing car park. The visual amenity of the area will also be improved through the repair and refurbishment of both the toilet block and car park layout.

Concerns have been raised regarding the provision of appropriate payment methods. The proposed Pay & Display machines will be the same specification as the existing already installed at site and found throughout the National Park car parks, i.e. coin only with the digital payment facility via PayByPhone. It was noted by a third-party that the parking area has limited mobile signal for some networks, which can cause difficulty when paying via a payment by app. Therefore, payment by card may be the only viable option for many visitors.

After discussions with the PCNPA Estates Manager, the Authority's specification for the machines to offer contactless card payment is that to meet the public's reasonable expectations of the system requires an extremely fast and reliable level of digital connectivity between the onsite Pay & Display machine and the remotely located payment service providers is required, and this is not currently available.

Overall, the development is considered to have an acceptable impact on amenity and is in accordance with Policy 30 of the LDP2.

#### 2.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping

PPW12, TAN5 and LDP2 Policy 11 (Nationally Protected Sites and Species) requires biodiversity considerations to be taken into account in determining individual applications. The presence of a species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.

To comply with Planning Policy Wales 12 (2024) and the *Environment (Wales) Act 2016*, planning authorities are expected to ensure every development positively contributes to biodiversity.

Chapter 6 of Planning Policy Wales 12 states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.

It also states that a green infrastructure statement should be submitted with all planning applications and that the green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the



site in question and must be used for demonstrating how the stepwise approach has been applied.

#### *Landscape:*

A standalone Green Infrastructure Statement (GIS) has been provided in accordance with the step-wise approach (Paragraph 6.4.15 of PPW12) using the PCNPA pro-forma.

The Pembrokeshire Coast National Park Authority's Tree and Landscape Officer has been consulted as a result of the landscaping works that have been proposed. It was noted in their response that additional landscaping would be provided throughout the site which is acceptable in principle; however, the proposals include sleeper-sided planters which are not typical landscape features that you would find throughout Pembrokeshire countryside.

It was considered that more appropriate landscape features would be Pembrokeshire hedgebanks which could be implemented to replace the existing sleeper-planters and the installation of the new linear features within the site. Furthermore, organic features such as sloped areas for natural regeneration and biodiversity potential for invertebrates in place of the proposed raised beds in the corners of the car park, would also be more suitable.

Whilst the Tree and Landscape Officer has expressed reservations regarding the proposed landscaping as noted above, officer consider that these issues can be overcome through the use of appropriate conditions. As such, an advisory note will be added to any permissions issued to ensure that 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.

#### *Biodiversity:*

The PCNPA planning ecologist notes that the application site is close to the West Wales Marine SAC. As the competent authority under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 the Authority has to consider the impact of development on the features for which the aforementioned sites are designated. A Test of Likely Significant Effect (TLSE) has been undertaken.

The Planning Ecologist considered in their response that whilst the site is only 220m from the SAC, as the site is currently used as a car park and the proposals are not to extend the used space, but to upgrade and replace existing infrastructure and surfaces, it is not considered that there will be any significant change in the use of the site or any potential increase in run-off from the site during operation.

The only potential for increased pollution from the development is during construction. However, as it is standard for a Construction Environment Management Plan (CEMP) to be requested as a condition of consent for any works of this nature close to a waterway regardless of any designation, it is not considered that the requirement for a CEMP on this occasion is a specific measure to protect the features of the SAC, but a standard measure to protect a waterway.

It is further noted by the Ecologist that any pollution events during construction would be very small and would have very little impact upon water quality given the size of the SAC and the opportunities for dilution prior to any supporting habitats or species for Harbour porpoise being impacted. As a result, the TLSE concluded that there will be No Likely Significant Effect from the proposal.

On the basis of the information provided by Rowan Ecological it is considered that an EPS license is not required in this instance and there is a reasonable likelihood that bats will not be affected by the development. Although no additional external lighting has been proposed, to ensure that any future installations are appropriate and do not impact upon ecological features surrounding the site a lighting condition should be added to any approved decision as to avoid light spill and impacts on protected species.

A working brief has been provided in Section 7.4.1 – 7.4.5 of the Ecological Report by Kite Ecology dated October 2024. Only small areas of vegetation or suitable habitat are proposed for removal, however, as there are records of reptiles within close proximity to the development, it has been recommended that works are undertaken in accordance with the working brief. A condition is included to ensure compliance with the working brief, safeguarding reptiles for the full duration of the project.

No specific biodiversity enhancements have been shown on the proposed drawings, however, there will be opportunities for biodiversity within any new landscaping. Consequently, officers are satisfied that the attached condition relating to a landscaping scheme can deliver biodiversity enhancements through native planting.

As a result of consultation with NRW a CEMP for the site has been requested. This plan will detail management methods to be implemented at the site during the course of the works to ensure that no protected species, designated sites or habitats are adversely affected during the construction phase.

It is suggested that a suitably worded condition be added to any permissions issued requiring this CEMP to be submitted for the express written consent of the Authority, subject to further consultation with the Authority's Ecologist and NRW, prior to the commencement of any works on site. Provided the development is carried out in accordance with the CEMP, NRW do not consider that the development will adversely affect the integrity of the SAC site.

NRW further note that the Bat Activity Survey Results submitted in support of the above application has identified bats were not using the application site. Therefore, NRW have no adverse comments to make on the application as submitted.

As such, with the suggested imposition of suitable pre-commencement conditions and the discharge of those conditions where appropriate, the development is considered to accord with Policy 11 of the LDP2 and statutory guidance relating to biodiversity and can be supported.

## 2.5 Access and Parking

Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that assist in delivering improved traffic and parking management.

Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.

The access route in and out of the car park will remain unchanged from the Highway. The works proposed are to regularise the southern section of the existing car park and no extension to the site is proposed. Therefore, the frequency and volume of car trips made to and from the site is unlikely to alter significantly from those made already and would not cause an unacceptable level of adverse impact on traffic, both on, and surrounding, the site. The plans also show improved pedestrian walkways throughout and around the car park including timber posts and planters separating the car park to the promenade, making walking through and around the site safer. The existing slipway access to the beach will be unaffected by the proposal.

Highways Development Control at Pembrokeshire County Council have assessed the submitted scheme and have raised no objection. However, the Highway Authority's response commented on the lack of motorcycle provision within the scheme, which should be 5% of overall parking provision in-line with local and national policy guidance. As such, a pre-commencement condition has been requested, ensuring that a detailed plan showing the provision for motorcycles spaces within the car park is submitted to the Authority for approval. In addition to the existing cycle provision within the car park, the inclusion of the electric bike charging point was welcomed by the Highways Team, as a way to support and promote active and sustainable travel across the county.

Two public rights of way (public footpaths PP71/69 and PP71/44) cross the site of the proposed car park improvements. These public footpaths are very popular as they form the route of the Pembrokeshire Coast Path National Trail and the Wales Coast Path. At present, the public footpaths run undefined across the car park and their route informally marked for path users.

The scheme proposes to integrate the coast path into the car park which will be accommodated by a number of gaps in boundary features of the proposed development. After review by the PCNPA Access Manager, some minor modifications have been recommended to improve the safety of pedestrians using the public footpaths.

Revised plans have since been received which take into account the comments of the Access Manager. These changes include reducing the length of the planters to improve visibility of path users entering the car park and adding public footpath waymarkers at egress points.

Overall, the development is considered to have an acceptable impact on access and parking and accords with Policies 59 and 60 of the LDP2.

## 2.6 Surface Water Drainage:

Policy 32 (Surface Water Drainage) of LDP2 requires that development will be required to incorporate sustainable drainage systems for the disposal of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.

The Drainage Engineers at Pembrokeshire County Council have confirmed that the plans indicate that surface water will be disposed of by means of sustainable drainage systems, which is deemed a suitable method for surface water disposal. However, as no detailed surface water drainage design has been submitted alongside the application, a condition requiring percolation testing should be added to any approved consent. If the results determine that the proposed SuDS system will not work, a revised drainage strategy will also need to be submitted and approved.

Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the development area having drainage implications appears to be in excess of 100 square metres; the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.

NRW made further comments on the development raising concerns in relation to the proposed cesspit as part of the new toilet block facilities, given the highly sensitive nature of the site. New developments proposing to use private drainage should follow the hierarchy within the Welsh Government Circular 008/2018 (July 2018). The Circular stresses the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

A detailed Ground Investigation Report was undertaken in April 2024 for the proposed development at Newport Sands car park. The report identified the underlying ground conditions, assessing the issues that could potentially impact the proposed development.

The ground investigation concluded that a new packaged treatment plant (PTP) draining treated foul water effluent into a drainage field is not appropriate for employment at the site location. It recommended that a sealed cesspool solution is employed which mimics the existing site's foul water drainage provision. By providing a new cesspool for the new toilet block, the load on the existing cesspool, used by the Surf building also, would be reduced. The report has since been sent to NRW for review and at the time of writing, the Authority is still awaiting their comments. However, an informative note which has been provided by NRW in relation to pollution prevention guidance will be added to any approved consent.

## 2.7 Other Matters

### *Flood risk:*

The application site lies partially within Zone C2 of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Sea.

NRW commented that given the scale and nature of the proposed development they consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks. An informative can be added to any consent approved regarding this matter.

In addition, the Coastal, Rivers and Drainage Manager at Pembrokeshire County Council was consulted and commented: *'Within the West of Wales Shoreline Management Plan (SMP) 2, the policy unit for this location is 4.18. The short-term policy for this area is Hold the Line (HTL), with the medium to longer term view to change to Managed Realignment (MR). This change should be in line with the roll back of the Bennet (policy unit 4.17). Therefore, this development should be mindful of this change in policy unit.'*

### *Environmental Health:*

The Public Protection Team at Pembrokeshire County Council were consulted on the scheme and considered there to be no significant environmental or health impacts associated with the proposed development and had no objection to the proposal. However, it was encouraged in their response that a development of this nature should, where possible, should support the provision of electric vehicle charging points. Officers consider that this objective is currently being met at the site with no. 4 EV chargers already installed within the northern section of the car park, with the development also providing a new electrical bike charging point.

### **Other Material Considerations:**

#### **Access:**

The public sector equality duty (Section 149 of the Equality Act 2010) must be considered when granting planning permission for any development.

The Welsh Government and local authorities have a duty to implement the UN Convention on the Rights of Persons with Disabilities (CRPD) in order to safeguard and promote all users' rights.

In addition, the Welsh Government's Framework for Action on Independent Living imposes extra duties on public sector organisations in Wales to improve opportunities for disabled people to access services and facilities.

In short, public authorities have a duty to:

- advance equality of opportunity
- eliminate discrimination and harassment

- promote positive attitudes
- encourage participation by disabled people

In providing facilities which will improve access for wheelchair users, including the provision of enhanced ramps, a disabled changing room and beach wheelchair storage for hire, the proposal will contribute to delivering equality of opportunity and this element of the proposal is a material consideration in its favour.

### 3. Conclusion

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

The proposal will result in improved and enhanced services for visitors to the popular Newport Sands car park by providing better beach access, clearly laid out parking bays and pedestrian zones, improved public convenience facilities, and landscaping enhancements across the site. Therefore, the proposed scheme is considered to be acceptable in terms of scale, form, use and design. The development will not cause an unacceptably detrimental impact to the special qualities of the National Park. It is not considered that the development will cause an unacceptable impact upon privacy or amenity of neighbouring properties. Ecology and landscape features will not be adversely affected by the development.

As such, the proposal complies with policies 1, 7, 8, 9, 11, 14, 29, 30, 32, 34, 54, 59 & 60 of the adopted Local Development Plan 2 2020 and can be supported.

### 4. Recommendation

**APPROVE**, subject to the following conditions:

- 1 The development shall begin no 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 ref: GA14 A100 Proposed Changing Place & Public Toilet – received 09/10/2024*  
*Drawing ref: GA01 (c) A100 Proposed Changing Spaces – received 09/10/2024*  
*Drawing ref: GA04 A104 Proposed 3D Images – received 09/10/2024*  
*Drawing ref: GA05 A105 Proposed Site Plan - received XXX*  
*Drawing ref: GA05(a) A105(a) Proposed Site Plan Arial Render – received XXX*  
*Drawing ref: GA06 A106 Proposed Rendered Image 02 – received 09/10/2024*  
*Drawing ref: GA07 A107 Proposed Rendered Image 03 – received 09/10/2024*  
*Drawing ref: GA09 A109 Proposed Rendered Image 05 – received 09/10/2024*  
*Drawing ref: GA11 A111 Proposed Rendered Image 07 – received 09/10/2024*  
*Drawing ref: GA02 A102(a) Existing Site Plan – received 09/10/2024*

*Drawing ref: GA02(b) A102(b) Existing Site Plan and Levels – received 09/10/2024*  
*Drawing ref: GA03(a) A103(a) Existing Site Elevations – received 09/10/2024*  
*Drawing ref: GA03 A103(b) Existing Site Drone Images – received 09/10/2024*  
*Drawing ref: GA04 A104 Existing 3D Images – received 09/10/2024*  
*Drawing ref: GA05 A105 Existing Rendered Image 01 – received 09/10/2024*  
*Drawing ref: GA06 A106 Existing Rendered Image 02 – received 09/10/2024*  
*Drawing ref: GA07 A107 Existing Rendered Image 03 – received 09/10/2024*  
*Drawing ref: GA08 A108 Existing Rendered Image 04 – received 09/10/2024*  
*Drawing ref: GA09 A109 Existing Rendered Image 05 – received 09/10/2024*  
*Drawing ref: GA10 A110 Existing Rendered Image 06 – received 09/10/2024*  
*Drawing ref: GA11 A111 Existing Rendered Image 07 – received 09/10/2024*  
*Drawing ref: GA12 A112 Existing Rendered Image 08 – received 09/10/2024*  
*Drawing ref: GA13 A113 Existing Rendered Image 09 – received 09/10/2024*  
*Drawing ref: GA01 A101 Existing Site Location (OS Maps) – received 09/10/2024*  
*Drawing ref: GA01 A101(b) Existing Site Location (OS Maps) – received 09/10/2024*  
*Drawing ref: Green Infrastructure Form – received 09/10/2024*  
*Drawing ref: Ground Investigation Report – received 07/11/2024*  
*Drawing ref: Ecology Survey (Kite Ecology) dated October 2024 – received 24/10/2024*  
*Drawing ref: Preliminary Roost Assessment Report (Rowan Ecological) dated 18/09/2024 – received 24/10/2024*  
*Drawing ref: Technical Note, Bat Activity Survey Results (Rowan Ecological) – received 24/10/2024*

**Reason:** In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

- 3 Prior to the installation of any external lighting, a light strategy, shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

**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 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species) and 14 (Conservation of the Pembrokeshire Coast National Park). Section 6 of PPW edition 12.

- 4 Prior to commencement of development, the result of percolation testing shall be submitted to and approved by the Local Planning Authority to ensure that the proposed drainage can be implemented. If the results determine that the proposed SuDS system will not work, a revised drainage strategy will also need to be submitted and approved. Such scheme as is approved shall be implemented and retained thereafter.

**Reason:** In order to ensure the scheme does not cause surface water flooding and in accord with Schedule 3 of the Flood and Water Management Act 2010

- 5 Before development commences detailed plans showing the provision for motorcycles facilities within the car park shall be submitted to the Local Planning

Authority for approval. Thereafter, the development shall proceed in accordance with the agreed scheme, with the parking facilities provided prior to the first use; and thereafter retained for that purpose.

**Reason:** These conditions are required to meet the objectives of the PPW 12th Ed (Feb 2024) and to satisfy GN1 (Highway Safety) of the adopted Local Development Plan for Pembrokeshire (adopted 28 February 2013) and Policy 60 (Impacts of Traffic) of the Pembrokeshire Coast National Park Local Development Plan 2 (end date 2031)

- 6 No phase of development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:
- Construction methods: details of materials, how waste generated will be managed;
  - General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
  - Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
  - Soil Management: details of topsoil strip, storage and amelioration for re-use.
  - Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
  - Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details
  - Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development. A CEMP should be submitted to ensure necessary management measures are agreed and implemented for the protection of the environment during construction.

**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 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species) and 14 (Conservation of the Pembrokeshire Coast National Park). Section 6 of PPW edition 12.

- 7 Development site clearance shall be carried out in accordance with the mitigation detailed within sections 7.4.1 – 7.4.5 of the submitted ecology report by Kite Ecology dated October 2024.

**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 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species) and 14 (Conservation of the Pembrokeshire Coast National Park). Section 6 of PPW edition 12.



- 8 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:
- Clarification of planting / landscaping proposals
  - Scale plan on proposed site layout showing precise site-specific locations
  - Schedules of plants (trees and hedges)
  - Plant species
  - Plant supply sizes
  - Proposed numbers of each proposed species
  - Hedge planting density and method (e.g. double staggered)
  - Implementation programme / timescale / phasing of planting
  - Management and replacement of failures details
  - Details of any constructed green features – Green roofs / Pembrokeshire hedgebanks
- 9 Development shall thereafter take place in accordance with the approved details. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by this authority.
- 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 of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 07 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009), Technical Advice Note (TAN) 10: Tree Preservation Orders

## 5. Informatives

### SAB Team

**SAB informative:** *Pembrokeshire County Council as SuDS Approving Body (SAB) considers that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres / more than one property; the proposed works will require SAB approval prior to the commencement of any works on site relating to this application.*

Please see [www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-body-sab](http://www.pembrokeshire.gov.uk/planning-contacts/sustainable-drainage-approving-body-sab) for more information

### NRW

**Flood risk:** *In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development. These could include flood barriers on doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the building and locating electrical sockets/components at a higher level above possible flood levels.*

We refer the applicant to our [website](#) for further advice and guidance is available. Additional guidance including the leaflet “Prepare your Property for flooding” can be found [here](#).

The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', can be found [here](#).

**Foul Drainage:** It is essential that any cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination of the ground, groundwater and, sometimes surface water. Any damage to the fabric of the cesspool, such as cracks or holes, is difficult to detect but needs to be rectified immediately in order to prevent pollution. The cesspit should meet the requirement of British Standard BS 6297. It should be fitted with a level warning device to indicate when the tank needs emptying.

Guidance: We recommend the applicant reviews the following guidance in relation to the proposed development:

- Guidance for Pollution Prevention 4 ([NetRegs website](#)): Sewage treatment and disposal where there is no foul sewer (GPP4)
- [EPR \(Environmental Permitting Regulations\) Guidance](#)
- NRW guidance (May 2019): [How to run your household sewage treatment system well](#) (this document contains some really useful explanatory text regarding different treatment options and EPR)

### **Ecology:**

**Bats:** It is recommended that the applicant be informed that all British bat species are European Protected Species by virtue of their listing under Annex IV of EC Directive 92/43/EEC ('The Habitats Directive'). This Directive has been transposed into British Law under the Conservation of Habitats and Species Regulations 2017. British bats are also protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended).

It is recommended that the applicant and contractors be informed of the possibility of encountering bats unexpectedly during works.

If bats are encountered on site works should stop immediately an NRW should be contacted (Natural Resources Wales, - General

Enquiries: [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk) or 0300 065 3000 Mon-Fri, 8am - 6pm) a licence may then need to be applied for from NRW. Licences are not automatically granted by virtue of a valid planning consent and it may be possible that the necessary licence application may be refused.

**Reptiles:** It is recommended that the applicant be informed that reptiles are protected under the Wildlife and Countryside Act 1981. The adder, grass snake, common lizard and slow worm receive protection under the Wildlife and Countryside Act from killing and injury. Care should therefore be taken during site clearance and construction to ensure that no reptiles are killed or injured.



Parc Cenedlaethol  
Arfordir Penfro  
Pembroke Coast  
National Park

Graddfa/Scale: 1:1,250

