

# PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT



**Ref No:** NP/24/0454/FUL  
**Proposal:** Change of use from lifeboat storage unit to takeaway food outlet (A1)  
**Site Location:** Former Inshore Lifeboat Store, Tenby Harbour, Tenby

**Recommendation:** Delegate Powers to Officers to Approve following expiration of publicity period.

**This application is being presented to the Development Management Committee as the Town Council have objected to the application, contrary to the Officer recommendation for approval. In addition, the application is a departure from the Local Development as a retail use is proposed outside of the Retail Centre as defined by the Local Development Plan.**

## Summary

This application seeks permission for the change of use of the existing lifeboat storage building, located at Tenby Harbour, into a cold food takeaway Class A1. There are to be no external changes to the building, other than the installation of a fascia sign, which is subject to a separate advertisement consent. The site is located within Tenby's designated Conservation Area.

During the consultation process, objections have been received from the Authority's Buildings Conservation Officer, Tenby Town Council and Tenby Civic Society. Careful consideration has been given to this proposal, especially in relation to the context of the use within the Harbour Area. Whilst it is acknowledged that the proposed use would introduce a retail element to this area of the Harbour, on balance, Officers consider that no significant harm would be caused to the character of Tenby Harbour as a result of this development since the use proposed occupies a relatively small floor area, and would not be a destination in and of itself, rather, it would rely on the existing footfall within the harbour.

This application is a departure from the Local Development Plan as it proposes a retail use outside of the defined retail centre, however, the scale and nature of retail use proposed is not considered to be of a type which would have an adverse impact upon the retail hierarchy by virtue of being located in close proximity to and within the settlement boundary for Tenby. Overall, the proposal is deemed to be acceptable, and as such, a recommendation to grant permission, following the expiration of the press notice, subject to no new material considerations being raised as a result.

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

## Consultee Response

- **Town Council** – Object
- **Buildings Conservation Officer** – Concern
- **Planning Ecologist** – Test of Likely Significant Effect not undertaken, no likely impact upon SAC features
- **PCNPA Tree and Landscape Officer** – Defer to comments of ecologist
- **PCNPA Access Manager** – No public rights of way affected

- **PCC Drainage Engineer** – No further comments
- **PCC Access Manager** – Comments in relation to the Equality Act (2010), CRPD and Framework for Action on Independent Living
- **Highways Authority** – No detrimental impact on existing parking arrangement, access or local Highway Network
- **PCC Public Protection** – No objections
- **Cadw** – No unacceptably damaging effect upon setting of Tenby Castle
- **Tenby Civic Society** – Object
- **Natural Resources Wales** – No objections. Advice re: flood resilience measures
- **Dwr Cymru Welsh Water** – No response at time of writing

### **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*.

Five third party representations have been received,  
*Objections are briefly summarised below:*

- The proposal is not in keeping to the character of the Conservation Area nor the working character of the community harbour
- The area is a busy working environment
- Proposed use would introduce additional conflict in one of the most useful areas
- Area has proved to be a bottle neck
- Closure time of 10pm conflicts with accepted practice for open air sales in the harbour to finish by 6pm
- Use could introduce problems of litter, noise and anti-social behaviour
- Proposed use of bird feeders on roof of building
- Building would be more appropriately used for a contained marine use
- No scope for outdoor seating
- Use would threaten the viability of multiple existing businesses in the area
- Development would cause damage to a Grade II Listed Building
- Development would result in a precedent of unacceptable and unsuitable uses in this historical area
- Proposed use would contradict Pembrokeshire County Council's original intentions for the space

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

The application has also been advertised in the press as a departure from the Local Plan.

### **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 15 – Development and Flood Risk
- TAN 24 - The Historic Environment

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

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

- Policy 01 (National Park Purposes and Duty)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 18 (Porthgain, Saundersfoot, Solva and Tenby Harbours)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 56 (Retail in National Park)
- Policy 57 (Town and District Shopping Centres)
- 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 – Conservation Areas
- SPG – Sustainable Design and Development
- SPG – Landscape Character

### Constraints

- Conservation Area – Tenby
- Special Area of Conservation - within 500m
- Site of Special Scientific Interest - within 50m
- Tree Preservation Order
- Rights of Way Inland – within 50m
- Ancient Monument – within 500m
- Recreation Character Areas
- Article 4 Directions
- Affordable Housing Submarkets

- Seascape Character Areas
- Within Site of Special Scientific Interest
- Landscape Character Area
- Special Area of Conservation – within 50m

### **Relevant Planning History**

NP/24/0670/ADV – Fascia sign board to face of property – Pending consideration at time of writing

Pre Application query PA/24/0060 - Change of use from a lifeboat storage building to takeaway food outlet (cold food only) – Permission required

NP/09/353 – External fuel storage - Approve

## **1. Officer's Appraisal**

### **Site and Proposed development**

The site is the former lifeboat store building located on Tenby Harbour. It is accessible either from the staircase leading down to the harbour from Crackwell Street, or, from the eastern side of the harbour. The building itself is constructed from stone, and has a flat, felt roof. There is currently a timber bi-fold door to the front of the building. It is located approximately 16 metres from the harbour's edge.

### **Current Proposal**

- The change of use of the former lifeboat store into a cold food takeaway (Class A1) – representing approximately 37.9m<sup>2</sup> of floor area.

## **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 matters

### **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.

This is a full application for minor development. The proposal comprises the change of the use of the former lifeboat storage building into a cold food takeaway, which for the purposes of the Use Classes Order is a retail use – A1.

National planning policy operates a sequential test for the location of new retail and commercial centre development. Para 4.3.18 of Planning Policy Wales (PPW) states that planning authorities should adopt a sequential approach when determining planning applications for retail and other complementary use. By adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres. The hierarchical approach in Local Development Plan 2 is based upon the need for additional retailing space. Policy 56: Retail in the National Park identifies the need for additional retailing floor space, this is directed to the town centre of Tenby and is identified for comparison floor space rather than convenience floor space and seeks to protect and enhance the viability, vitality and attractiveness of the retail and commercial centre of Tenby. Para 4.308 of the LDP states that proposals which may potentially damage or undermine the retail role of centres will be resisted by restricting the development outside these centres in accordance with national planning policy which operates a “town centres first” approach.

In this instance, the building is located approximately 25 metres outside of the defined Retail Centre and is a proposed use that would be acceptable within that centre. As such, it is not considered that the proposal would undermine the retail hierarchy by virtue of being located in close proximity, and within the settlement boundary. Therefore, whilst the proposal is a departure from the Local Development Plan on the basis that it proposes a retail use outside a defined centre, by reasons of its scale and location it is deemed to be acceptable. Furthermore, Policy 6 of Future Wales (2021) states that whilst the principle of “Town Centre First” is well-established in planning policy, good planning can help us re-think the future of towns and city centres. Following the COVID-19 pandemic, the impact upon the retail sector is a further driver towards making town centres multi-functional places, and whilst town centres remain important focal points of communities, they are more than the extent of designated retail areas.

Since the site is located at Tenby's Harbour, Policy 18 of the Local Development Plan is applicable. This policy states that development within the identified harbour areas will be permitted provided that:

- a) it sustains harbour activities, and
- b) it conserves or enhances the existing character of the harbour.

Whilst it is acknowledged that several third party representations have been received which outline concerns that the proposed retail use in this location would not be in keeping with the character of the harbour, and that consultees also have these concerns, Officers have carefully assessed the proposal against Policy 18 of the LDP2 and consider that since the proposed use would occupy a relatively small floor area within the harbour, no significant harm would be caused to the character of this working harbour. Officers have also taken the fact that the proposal would bring an empty building back into use into consideration and conclude that the re-use of this building would be welcomed.

Whilst comments have been made regarding alternative uses for the building, Officers must consider the use proposed as part of this application.

Concerns have also been raised in relation to the potential for the proposed use to cause conflict between those working within the harbour and users of the proposed A1 cold food takeaway. However, it should be noted that the area is accessible by members of the public, and that the proposed use would not represent a destination in and of itself, rather, it would rely on existing footfall within the harbour area.

The proposal is a departure to Policy 56 in that it proposes a retail use outside a defined retail centre, however as set out above given the limited floorspace proposed the proposal is not considered to be of a level or nature that would undermine the LDP retail hierarchy. The proposal is considered to be of a scale which conserves the existing character of Tenby Harbour and to comply with the broad direction of relevant national and local planning policies and is acceptable.

## **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 site is located on Tenby Harbour and is located within Landscape Character Area No.2 – Tenby. The special qualities of this area include:

- A very strong sense of place
- Distinctive coastal topography with an intimate association between the town and the shore
- Long-established historical centre
- Historical built features of national importance
- Tenby's Conservation Area

The proposal here is for the change of use of the former lifeboat store into a cold food takeaway, which comes under Use Class A1 (retail).

No external changes in the form of extensions or demolition are proposed and it is not proposed to install any additional internal or external lighting as part of this proposal. Therefore, it is not considered that the proposal would result in visual intrusion, or that the development would be unsympathetically sited within the landscape, since the building is already in existence.

The Buildings Conservation Officer has been consulted on this application and has raised concerns in relation to the introduction of inappropriate commercial uses, or an unacceptable level of such, and points out that the harbour is already served by a kiosk selling hot drinks and snacks. Whilst the comments of the Buildings Conservation Officer are taken into account, it is not considered that the introduction of this new A1 use would result in an unacceptable level of such uses. Whilst it is acknowledged that there is a café located on Penniless Cove Hill, it is not considered that the introduction of this proposed A1 use would result in a harmful cumulative impact of commercial uses within the area since the café on Penniless Cove Hill is not within the Harbour area as defined by the LDP2. In addition, should further proposals be submitted for A1 / A3 uses, they would be assessed at such a time as they are submitted, and considered on their own merits.

The Buildings Conservation Officer has raised no concerns in relation to the proposal's impact upon the setting of surrounding listed buildings.

Consultation with Cadw has taken place in relation to the Scheduled Ancient Monument (SAM) – Tenby Castle. No objections have been raised in relation to the impact upon this SAM.

In terms of design, as there are no external changes proposed, the building would remain as is, and such, its design is considered to be acceptable.

Confirmation has been received from the applicant that the roof of the building is intended to be used for boat storage. However, the use of the roof area as storage may have the potential to impact the appearance of the area. As such, a condition will be imposed that prohibits the use of the roof unless specific planning permission is obtained.

Overall, and on balance, it is not considered that the proposed development would have an adverse impact the special qualities of the National Park, and is in accordance with Policies 8, 14 and 29 of the Local Development Plan.

### 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 proposed development would be located at Tenby's harbour, the nearest residential dwelling sits on Crackwell Street, which is a significant distance uphill from the application building. However, it is acknowledged that planning permission has been obtained for the refurbishment of No.9 Crackwell Street. However, the approved floor plans for this building show that the lower ground section, which overlooks the harbour would be used as a store / utility and study. Given that these are not classed as high occupancy, habitable spaces, it is not considered that the proposed A1 use would cause significant harm to the residential amenity of this property, subject to a suitably worded condition in relation to hours of opening. One of the concerns raised related to the proposed opening time until 10pm. However, the applicant has clarified that this would be limited to the two dates of the Tenby Summer Spectacular, and that normal opening hours would be between 10am and 5pm April to September during the school holidays, with limited opening hours during the winter. As noted above, a condition will be imposed in relation to hours of opening.

Given that the development is on a relatively small scale, it is not considered that it would be incompatible with its surroundings. Neither is it considered that it would lead to an increase in traffic, noise, or odour that would have a significant adverse effect

No new internal or external lighting is proposed as part of this development, and as such, the proposal would not result in lighting that would have a significant adverse effect.

Overall, the proposal is considered to be in accordance with Policy 30 of the Local Development Plan.

### 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.

The application site is located within the Tenby Cliffs and St Catherine's Island Site of Special Scientific Interest (SSSI), and in close proximity to the Carmarthen Bay and Estuaries Special Area of Conservation (SAC). As such, consultation has taken place with Natural Resources Wales (NRW). NRW confirm that the proposal is not likely to have a significant effect on either the SSSI or SAC.

The planning ecologist has also been consulted on the application and advises that as the proposal does not involve ground works, or a loss of permeable ground, it is considered not likely that the development would cause any adverse effects including sediment transfer and deposition, turbidity, noise, visual presence, physical disturbance sediment transfer and nutrient transfer. In addition, there will be no reduction in the area of habitat within the SAC and there will no direct or indirect change to the physical quality of the environment (including the hydrology) of the habitats within the site. There is unlikely to be any ongoing disturbances to species or habitats for which the site is notified or changes in species composition or populations size of any feature and there no pathways to effects. On that basis, the planning ecologist advises that on this occasion, a full Test of Likely Significant Effects has not been undertaken.

A green infrastructure statement has been received with the application. There is to no loss of green infrastructure, and it is proposed to provide outdoor hanging baskets to the building. This is considered to be proportionate to the level of development proposed.

The green infrastructure statement also notes that bird and bat boxes, and bird feeders will be located on the roof of the building. Concerns have been raised in relation to the proposed bird feeders in light of the issues pertaining to seagulls within Tenby. No specific details in relation to the type of bird / bat boxes or feeders have been received. In order to achieve a suitable biodiversity enhancement scheme, a condition will be imposed which requires these details to be submitted to and approved by the Authority.

Overall, subject to suitably worded conditions, the proposal is deemed to be in accordance with Policy 11 of the LDP2, PPW 12 and TAN 5.

## 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.

Concerns are raised within the comments received as a result of publicity in relation to traffic and transportation. The Highways Authority has been consulted on this application and has confirmed that there would be no change to current parking arrangements, access or the Local Highway Network and does not raise any objections.

Overall, the proposal is considered to be in accordance with Policies 59 and 60 of the Local Development Plan.

## 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.

As there are no changes proposed to the current regime of surface water disposal, the drainage section have no comments to make on the proposal.

## 2.7 Flooding

Whilst the property is not located within the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15, the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 Sea.

As such, a Flood Consequences Assessment has been submitted with the application. Natural Resources Wales (NRW) consider that the proposal could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures.

As such, an informative will be included within the decision notice directing the applicant to the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties'

## 2.8 Other matters

Concerns have been raised as a result of publicity in relation to competition, and Pembrokeshire County Council's tendering process. As these are not material planning considerations, they cannot form part of the application's assessment.

### 3. Conclusion

Having regard to all matters raised, Officers consider that on balance, the proposed development is acceptable and therefore, a recommendation to grant permission subject to conditions is made.

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.

### 4. Recommendation

**Delegation to the Director with responsibility to APPROVE**, subject to the following conditions and subject to the expiration of the publicity period:

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: Proposed Layout Rev E, received 8<sup>th</sup> November 2024
  - Flood Consequences Assessment, received 29<sup>th</sup> August 2024
  - Green Infrastructure Statement, received 16<sup>th</sup> September 2024
  - Green Infrastructure Statement Sketch Plan, received 16<sup>th</sup> September 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. Details of the proposed scheme for biodiversity enhancements shall be submitted to and approved by the Local Planning Authority prior to the commencement of development.  
**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)
4. The development hereby approved shall not operate outside of the following hours:  
10:00 and 17:00.  
**Reason:** In the interests of amenity. Policy Local Development Plan 2 – Policy 30 (Amenity)
5. Prior to the installation of any external lighting, full details of the lighting shall be submitted to and approved by the Local Planning Authority. Any external lighting proposed to the development should be low level, hooded and

downward facing to avoid light spill, avoid shining directly onto features such as woodland edge and hedgerows, and should be operation on a PIR activated timer.

**Reason:** In the interests of maintaining the special qualities of the landscape and habitats of the National Park through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Nationally Protected Sites and Species), 30 (Amenity) and to comply with the Wildlife and Countryside Act 1981 (as amended). Supplementary Planning Guidance can be found at Biodiversity Supplementary Planning Guidance - Pembrokeshire Coast National Park.

6. There shall be no use of the roof of the property for storage or café purposes without specific planning permission first being sought.

**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)

## 5. Informatives

### Natural Resources Wales

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 ground floor doors, windows and access points and locating electrical sockets/components at a higher level above possible flood levels.

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

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11485/2187544.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11485/2187544.pdf)

### Protected Species

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). 4 of 5 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 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.



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

Graddfa/Scale: 1:1,250

