PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT

Ref No: NP/24/0492/FUL

Proposal: Change of use from Salon (A1) to Apartment Dwelling (C3) **Site Location:** Ocean Hair, The Old Brewery, Brewery Terrace, Saundersfoot,

Pembrokeshire, SA69 9HG

Recommendation: Approve

This application is being presented to the Development Management Committee application is deemed to be a departure from the Local Development Plan.

Summary

This application seeks consent for the change of use of the existing hair salon, to an apartment. As the property is located within Saundersfoot's Retail Centre, the proposal is deemed to be a departure from the Local Development Plan as the C3 residential use is not included within the use classes that would be deemed acceptable within this shopping centre. However, given that the property is accessed via an alleyway between two buildings and does not form part of a retail frontage and given the focus from Future Wales on town centres as multi-functional places and which are appropriate locations for new homes, the change of use from Class A1 to Class C3 is considered to be acceptable.

The property is also located within Saundersfoot's Conservation Area. It is not considered that the proposal would harm the character or appearance of this Conservation Area. No adverse comments have been received from consultees

Therefore, based on the above, the Officer recommendation is that the application be delegated to the Chief Executive, Director of Place and Engagement or to the Development Management Manager to issue consent subject to the receipt of a Unilateral Undertaking Agreement addressing the provision of a commuted sum towards off-site Affordable Housing, and subject to the conditions listed below, provided that the legal agreement is received within 3 months of the decision date.

The full plans and associated documents can be viewed on the website by following this link: <u>Citizen Portal Planning - application details</u>

Consultee Response

- Community Council No response at time of writing
- Buildings Conservation Officer: No adverse comment
- Planning Ecologist:
- Highways Authority: Conditional consent
- **Drainage Engineer:** No comment
- Natural Resources Wales: No objections

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- Trunk Road Agency: No objections
- Cadw: No response at time of writing
- Public Protection Officer: No objections
- Dwr Cymru Welsh Water: Conditional consent

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 representations have been received.

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:

- 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 04 (Saundersfoot Local Centre (Tier 2) (Strategy Policy)
- 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 35 (Development in the Coastal Change Management Area)
- Policy 40 (Self-catering Development)

- Policy 46 (Housing)
- Policy 47 (Housing Allocations or Land with Permission)
- Policy 48 (Affordable Housing)
- 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:

- Affordable Housing
- Saundersfoot Conservation Area
- Parking Standards
- Sustainable Design & Development

Constraints

- Seascape Character Areas
- Landscape Character Area
- Conservation Area Saundersfoot
- Technical Advice Note 15
- NPA Property within 25m
- Special Area of Conservation within 500m
- Special Protection Area within 500m
- Contaminated Land
- Biodiversity Issue
- Ancient Monument within 500m
- Potential for surface water flooding
- Recreation Character Areas
- Low Coal Risk
- Surface Coal
- Affordable Housing Submarkets.

Relevant Planning History

PA/24/0131 – Change of use of hairdressing salon (A1) to residential apartment (C3) – Preapplication enquiry. Planning permission required.

1. Officer's Appraisal

Site and Proposed development

The application site is located in Saundersfoot, within the retail centre as defined within the Local Development Plan.

The current use of the property's ground floor is a hair salon – Class A1.

It is comprised of three storeys, finished in white render and a slate roof.

The property is set back from the main highway and is located to the rear of a hot food takeaway.

The NPA car park is located to the west of the property.

The property currently has 3 off-street parking spaces for customer use.

Current Proposal

The proposal comprises:

The change of use of the existing hair salon into apartment.

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 Flooding
- 2.8 Affordable Housing
- 2.9 Occupancy Restrictions

2.1 Policy and Principle of Development:

- 2.1.1 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).
- 2.1.2 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.
- 2.1.3 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...'.

- 2.1.4 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.
- 2.1.5 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.
- 2.1.6 This application is for a minor development and seeks consent for the change of use from hair salon (Class A1) to apartment (Class C3).
- 2.1.7 The property is located within the Centre Boundary of Saundersfoot as defined by the LDP2. Policy 4 (Saundersfoot Local Centre) sets out the land use priorities for Saundersfoot and includes providing for and / or permit housing to facilitate the delivery of the affordable housing needs of the local areas, to protect and enhance the district shopping centre and community facilities to meet the needs of the local area and visitors, to ensure developments permitted contribute to the protection and enhancement of the village's special qualities and to assist Saundersfoot in preparing for and adapting to coastal change.
- The property also lies within the Saundersfoot Retail Centre, the Conservation area and lies on the edge of the C2 Flood Zone (TAN 15 Development Avice Map), Zone 3 Rivers and Sea of the Flood Map for Planning and the Coastal Change Management Area.
- 2.1.9 Policy 57 is relevant to this application as the property is situated within the defined Retail Centre. Policy 57 states that within the district shopping centre of Saundersfoot, changes of use, redevelopment or development of new buildings will be permitted where a) if in a town or district shopping centre, the proposal falls within Class A1, A2, A3,B1, C1, D1, or D2 of the use classes order is a sui generis use usually found in such shopping centres and d) the scale, siting and design is appropriate and would contribute to the character and appearance of the area. C3 use is precluded. This policy is intended to ensure that the vitality, viability and diversity of shopping centres is maintained and enhanced. Paragraph 4.314 of the Plan states residential development above ground level will be considered appropriate.
- 2.1.10 Whilst this application is deemed to be a departure from the Local Plan as the use proposed does not fall into any of the uses referred to within Policy 57, this property does not front the main shopping area of Saundersfoot. Rather, it is located along a small alleyway and is behind a retail property which does front onto the shopping area. As such, it is not considered that the change of use of hair salon to a residential apartment would have an adverse impact upon the vitality, vibrancy or diversity of Saundersfoot's Retail Centre.

- 2.1.11 In addition to these considerations, weight must be given to Future Wales Policy 6 Town Centre First. Future Wales has Development Plan status and represents a more up to date Development Plan than the adopted Local Development Plan 2.
- 2.1.12 Future Wales Policy 6 (Town Centre First) describes how the impact of Covid-19 on the retail sector is a driver towards making our town centres multi-functional places. It notes that "As well as non-residential development, town centres are an appropriate location for new homes."
- 2.1.13 When considering the weight to be applied to the Future Wales policy and the nature and circumstances of this proposal, it is considered acceptable, notwithstanding the departure from Policy 57, provided appropriate contributions towards Affordable Housing are made (see below section for analysis).
- 2.2 Siting, Design, and Impact upon the Special Qualities of the National Park:
- 2.2.1 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.
- 2.2.2 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.
- 2.2.3 Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
- 2.2.4 Planning Policy Wales (edition 12, 2024) states at paragraph 6.1.14 that there should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas.
- 2.2.5 Section 160 of the *Historic Environment (Wales) Act* requires that when considering planning applications, special attention must be paid to the desirability of preserving or enhancing the character or appearance of the area in Conservation Areas.
- 2.2.6 The property is located within Landscape Character Area 1 Saundersfoot Settled Coast. The special qualities of this area include:
 - Attractive farmland and woodland patches which intersperse the smaller settlements and farmsteads
 - A coastal feel with an open nature and attractive views along the coast, the view southwards from Amroth towards Tenby being notable for the prominent landmark of the church spire in the distance, seen above Monkstone Point in the middle ground,

- The country estate landscape and parkland character around Hean Castle and Coppet Hall is very attractive and locally distinctive,
- Habitats of internal importance, contributing to some parts of the landscape having a high ecological value,
- The historical and archaeological features recorded here are such that the whole area merits a high historical value, especially industrial relics, such as the tramway and incline,
- Recent changes in holiday trends have eroded the original seaside town character, but the essential feel is not yet lost,
- Saundersfoot has a Conservation Area centred on the old town area along the sea front and harbour.
- 2.2.7 There are no external changes proposed to the building to facilitate the development, other than the removal of the current signage. Therefore, there are no concerns in relation to the development being visually intrusive.
- 2.2.8 As the property is located within Saundersfoot's Conservation Area, the Buildings Conservation Officer has been consulted on this application and does not wish to raise any adverse comments in relation to the development's impact upon the character or appearance of the Conservation Area.
- Overall, it is not deemed that the proposal would cause harm to the area's special qualities. It is also considered to preserve the character of the Conservation Area and therefore, it is considered that the proposal would comply with the provisions of Policies 8, 14 and 29 of the Local Development Plan 2 as well as the legislative duties in relation to Conservation Areas.

2.3 Amenity and Privacy:

- 2.3.1. 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:
 - 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.
- 2.3.2. Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.
- 2.3.3. This proposal would see the change of use of the existing hair salon into a residential apartment. Whilst the window on the western elevation of the building would serve a bedroom, this would not be directly opposite the northern elevation of the property known as Brewery Cottage. As such, it is not considered that there would be harmful overlooking created as a result of this development.

- 2.3.4. Whilst the proposal would see the introduction of a new residential unit, the first and second floors of the building are already residential in nature, and as such, it is not considered that there would be significant harm in terms of residential amenity.
- 2.3.5. No external lighting is proposed as part of the development. Whilst the proposal may lead to an increase in the use of internal lighting, the remaining two floors of the building are residential in nature and as such, the use of internal lighting already takes place.
- 2.3.6. It is not considered that the introduction of a one-bedroomed apartment would lead to a detrimental increase in traffic.
- 2.3.7. Overall, the proposal is deemed to be in accordance with Policy 30 of the Local Development Plan 2.
- 2.4 <u>Biodiversity, Protected Sites, Green Infrastructure & Landscaping</u>
- 2.4.1. PPW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 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.
- 2.4.2. 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.
- 2.4.3. 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.
- 2.4.4. 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.
- 2.4.5. A standalone green infrastructure statement has been received with the application. Whilst it does not follow the step-wise approach, it does state that a fruit tree planted within a pot will be provided. This is considered to be appropriate and proportionate to the development proposed since there are limited opportunities at this site to provide green infrastructure.
- 2.4.6. A biodiversity enhancement in the form of a bird box is proposed to be installed on the side elevation of the building. Again, this is considered to be acceptable.

2.4.7. The planning ecologist has been consulted on this application. Since no development is proposed to the roof of the property to facilitate the development, it is not considered that a protected species survey is required in this instance.

2.5 Access and Parking

- 2.5.1. 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.
- 2.5.2. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
- 2.5.3. As part of this application, it is proposed that the existing parking spaces currently serving the hair salon be used in connection with the existing and proposed apartments. The Highways Authority has been consulted on this application. There are no concerns raised in relation to highway safety subject to a condition requiring the off-street parking being provided prior to the building being occupied.
- 2.5.4. The Highways Authority also encourage all sites to prioritise active travel within the area and that a contribution is made towards the provision of sustainable transport networks within the proximity of the site. As such, cycle storage is shown on the proposed site plan, and this is to be situated opposite the building. The Highways Authority suggested that one stand per 2 bedrooms be provided. There would be provision for three bicycles as part of this development, and as such, this is considered acceptable.
- 2.5.5. Given the building's proximity to the Trunk Road, the Trunk Road Agency (TRA) has been consulted. No issued have been raised.
- 2.5.6. Overall, and with the inclusion of suitably worded conditions, the proposal is considered to be in accordance with Policies 59 and 60 of the Local Development Plan 2.

2.6 Surface Water Drainage:

- 2.6.1. 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.
- 2.6.2. The Drainage Engineer has been consulted on this application, and notes that there will be no changes to the current regime of surface water disposal. As such, no comments or concerns are raised, and the proposal is deemed to be in accordance with Policy 32 of the Local Development Plan 2.

2.7 Flooding

- 2.7.1. The property lies on the edge of the C2 Flood Zone (TAN 15 Development Advice Map), Zone 3 Rivers and the Sea of the Flood Map for Planning and the Coastal Change Management Area (Policy 35). As neither the property nor the access and egress routes to the property area within the flood zones, the proposal is deemed to be in accordance with Policy 34 (Flooding and Coastal Inundation) or Policy 35 (Coastal Change Management Areas) despite being classed as a highly vulnerable development.
- 2.7.2. The Authority has consulted within Natural Resources Wales. No objections have been raised in terms of flood risk. NRW have advised that the applicant may wish to use currently available flood risk information to inform them further for the purposes of resilient design and safe management of the site.

2.8 Affordable Housing

- 2.8.1. As this application proposes the creation of one residential unit, a financial contribution towards off-site affordable housing will be required in accordance with Policy 48 (Affordable Housing) and Policy 55 (Infrastructure Requirements) of the LDP2, and the Authority's Supplementary Planning Guidance. This is calculated at £250 per square metre.
- 2.8.2. A draft agreement has been received by the Authority; however, it has been completed on the incorrect template. The contents of the agreement has however been checked by the Legal Team at the County Council and the details are satisfactory.
- 2.8.3. At the time of writing, no updated agreement has been received. If, after 3 months of the date of the decision, no updated agreement has been received, this development will be refused as it would be deemed contrary to Policy 48 (Affordable Housing) of LDP2.

2.9 Occupancy Restrictions

- 2.9.1. In October 2022 Welsh Government made changes to the planning legislation and policy to introduce three new use classes, namely C3 for dwelling houses, C5 for dwelling houses used as second homes, and C6 for the short-term lets. Additionally, The Town and Country Planning (General Permitted Development) Order 1995 was amended to permit changes between the new use classes. These developments are particularly relevant to the Pembrokeshire Coast National Park Authority as a Local Planning Authority. The Authority agreed to introduce consideration of this issue on a case-by-case basis to assess whether, under certain circumstances, to apply a C3 occupancy condition on dwellings.
- 2.9.2. In consideration of the appropriateness of applying occupancy restrictions, it has been considered how Strategy Policy 46 (Housing), Policy 40 (Self-catering Development), Policy 47 (Housing Allocations or Land with Permission) and Policy 48 (Affordable Housing) of LDP2 apply. In addition, a desk-based analysis has been undertaken on the prevalence of second homes and holiday lets, cluster analysis of second homes and

holiday lets, the prevalence of second homes and holiday lets in similar development in the area and in recent developments.

2.9.3. The desk-based analysis shows a higher prevalence of second homes and holiday lets, both within the cluster analysis and in similar developments. As such, it is considered that a condition restricting the use of the apartment to C3 use and excluding permitted development rights to move to either a C5 (second home) or C6 (short term commercial letting property) is justified. As such, a suitably worded condition will be imposed.

3. Conclusion

Having regard to all matters raised above, whilst the proposal would represent a departure from the Local Development Plan as it proposes a residential use within Saundersfoot's retail centre, it is not considered that harm would be caused to the vibrancy, vitality or diversity of Saundersfoot's retail centre. As such, the proposed use is considered to be acceptable.

There are no over-riding concerns in terms of the impact upon visual nor residential amenity. It is not deemed that the proposed use would have an adverse impact on Saundersfoot Conservation Area's character or appearance. Subject to the receipt of a valid unilateral undertaking agreement, the proposal is acceptable.

A recommendation to grant permission upon the receipt of the unilateral undertaking agreement 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 – Approval

For the application to be delegated to the Chief Executive, Director of Place and Engagement or to the Development Management Manager to issue consent subject to receipt of a signed unilateral undertaking within 3 months of this decision and subject to the conditions listed below.

If the Unilateral Undertaking agreement is not completed within 3 months of the date of the Committee resolution, then delegated power be given to the Chief Executive, Director of Placemaking or to the Development Management Manager to exercise discretion to Refuse the application on the ground of non-compliance with Policy 48 (Affordable Housing) and Policy 55 (Infrastructure Requirements) of the Local Development Plan 2.

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:
 - Proposed Site Plan, received 5th November 2024
 - Proposed Floor Plan, Rev A, received 5th November 2024
 - Proposed Elevations, Rev A received 5th November 2024
 - Green Infrastructure Statement, received 17th 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. The use of the apartment hereby approved shall be restricted to C3 (Dwelling Houses) as a sole or main residence and occupied for more than 183 days per calendar year, as defined by the Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022 (or in any provision equivalent to that class in any statutory instrument revoking and re-enacting that order with or without permission)
 - **Reason:** In order to ensure that the accommodation is solely occupied as a main residence only and not for any other residential purpose.
- 4. 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: In order to meet the objectives of Planning Policy Wales Edition 12 (2024) and to satisfy Policy 60 of the Pembrokeshire Coast National Park Local Development Plan 2 (202).

5. <u>Informatives</u>

Highways Authority

It is the responsibility of the Authority to provide the naming and numbering of all roads and new developments and to facilitate in the provision of service connections. To ensure suitable and accurate addressing is provided, contact the Street Naming & Numbering Officer on 01437 775224 /snn@pembrokeshire.gov.uk at the earliest opportunity should this application be approved.

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).

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

If bats are encountered on site works should stop immediately and 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.

Flooding

The applicant may wish to use currently available flood risk information to inform them further for the purposes of resilient design and safe management of the site.

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