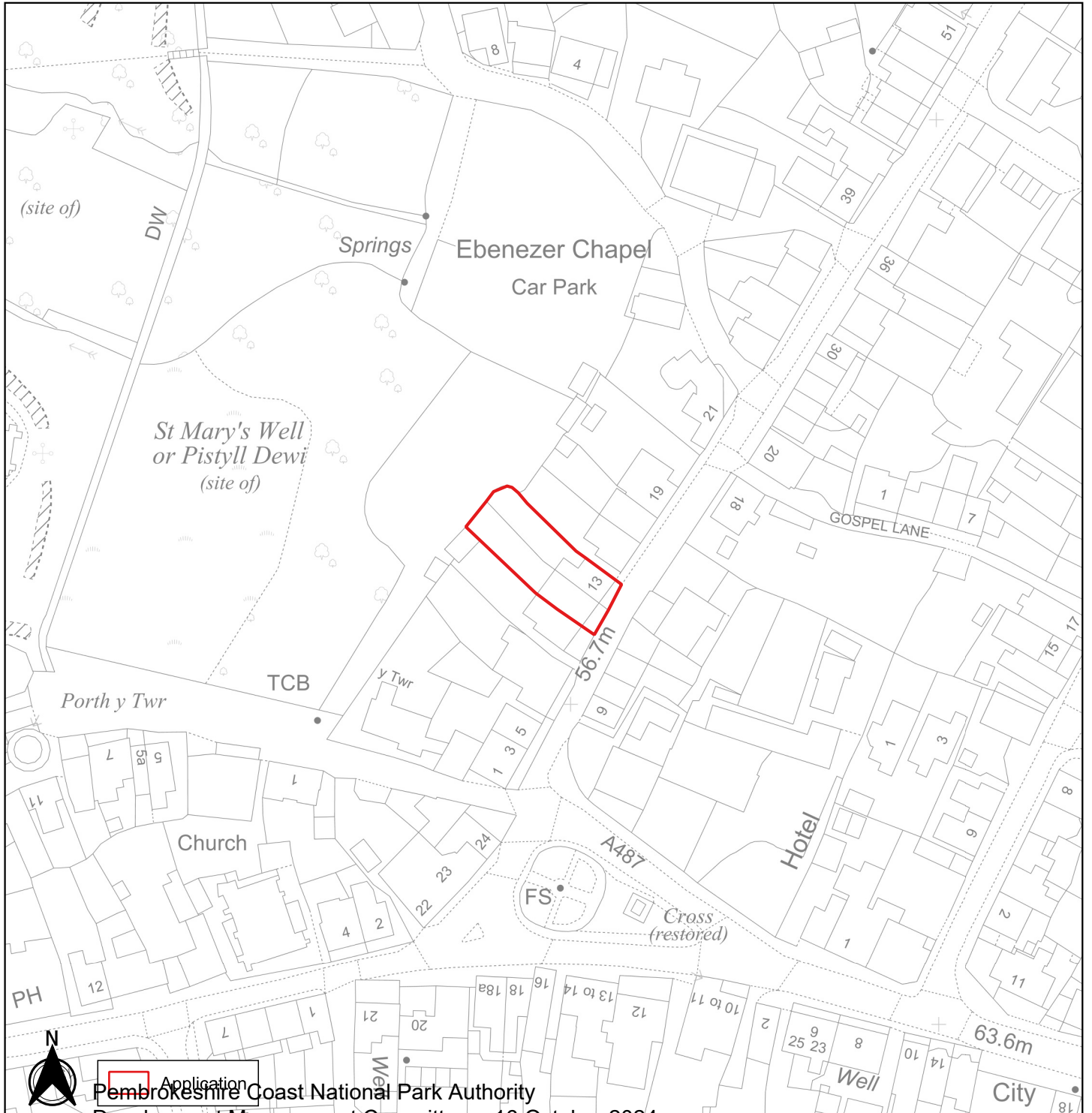




Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

Graddfa/Scale: 1:1,250



Application  
Pembrokeshire Coast National Park Authority

Development Management Committee – 16 October 2024

**PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY  
COMMITTEE REPORT**



**Ref No:** NP/24/0427/FUL  
**Proposal:** Mixed use of 11-13 Nun Street as bed and breakfast and to house part of the gin distillery plant that is required for processing gin distillations for St Davids Distillery  
**Site Location:** 11-13 Nun Street, St Davids, Haverfordwest, Pembrokeshire

**Recommendation:** Refuse

**This application is being presented to the Development Management Committee as the Community Council have resolved to support the application, contrary to the Officer recommendation for refusal.**

### **Summary**

This application seeks consent for the mixed use of the premises as bed and breakfast and gin distillery. Whilst the description given by the applicant refers to “part of the gin distillery plant” being housed at the premises, it is considered that since the gin still is the crucial element required for the process of gin distillation, the application does seek consent for a gin distillery. This application is a resubmission of a previously refused planning application, ref NP/23/0280/FUL. An application for listed building consent was also refused, however, given that no external alterations are proposed, there is no accompanying application for listed building consent at this time. There are a number of mitigation measures suggested in order to minimise the risk associated with the use of ethanol at this site. However, the measures required to control these measures would not, in the opinion of the Authority, be reasonable, practical or enforceable. As a result, the proposal would be inappropriate, and as such, a recommendation to refuse planning permission is made.

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

### **Consultee Response**

- **Community Council** - Support
- **Buildings Conservation Officer** – No adverse comments
- **Health and Safety Executive (Land Use Planning)** – Comments
- **Cadw** – No objection
- **Public Protection** – No comments received at time of writing
- **Health and Safety Area Officer** – Comments
- **Heneb: The Trust for Welsh Archaeology** – No comments rec'd at time of writing
- **Highways Authority** – No comments received at time of writing
- **Mid Wales Fire and Rescue Service** – No comments received 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*.

14 representations have been received at the time of writing, all of which are objecting to the proposed development. The main concerns are summarised below:

- The proposal could result in death, injuries and large-scale damage to property;
- Concerns regarding Health and Safety
- The site is not suitable for producing and storing inflammable materials
- Concerns regarding traffic
- Manufacturing in a residential area
- Building access
- The bar shown on the drawings is not existing
- Impact of noise and lack of privacy
- No reference to Building Regulations
- No access available through the garden of No.9 or the passageway between Nos. 13 and 15
- Creation of secure working environment not shown
- Inadequate consideration given to the historical and architectural interest of the premises and setting of conservation area.
- There are other industrial settings in and around St Davids that could be used for housing the distillery
- Any ventilation would impact the historic fabric of the property
- Unclear as to whether the bar and restaurant refers to the applicant's restaurant over the road
- Inaccurate labelling of gin

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

## **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 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 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>

- Policy 01 (National Park Purposes and Duty)
- Policy 05 (St Davids 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 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 – Sustainable Design and Development
- St Davids Conservation Area

#### **Constraints**

- Biodiversity Issue
- Historic Landscape
- Safeguarding Zone
- Ancient Monument – within 500m
- Hazardous Zones
- Recreation Character Area
- Article 4 Directions
- Affordable Housing Submarkets
- Conservation Area – St Davids
- Landscape Character Area
- Listed Building

#### **Relevant Planning History**

- NP/23/0280/FUL – Changes to existing guest house & residential dining (Class C1) with bespoke gin distillery (B2) & small bar/restaurant (mixed use C1/A3) together with alterations – Refused 25-Oct-2023
- NP/23/0281/LBA – Alterations in association with changes to existing guest house & residential dining (Class C1) with bespoke gin distillery (B2) & small bar/restaurant (Mixed Use C1/A3). – Refused 25-Oct-2023
- NP/22 0603/DOC – Discharge of condition No's 3, 5 & 7 of NP/19/0622/FUL – Discharged 10-Nov-2022
- NP/19/0623/LBA – Replacement of UPVC windows with timber sash windows and minor internal alterations – Approved 04-Mar-2020
- NP/19/0622/FUL – Change of use to B & B – Approved 02-Jun-2020

- NP/19/0473/FUL – Change of use of bed and breakfast household to public bar / restaurant on first floor and new metal balcony to rear elevation – Withdrawn 07- Nov-2019
- NP/19/0474/LBA – Construction of first floor balcony to rear (West) elevation, including replacement of uPVC windows with timber sash windows. Minor internal alterations – refused 05-Nov-2019

## 1. Officer's Appraisal

### Site and Proposed development

The site is part of Cathedral Villas, which are located on Nun Street, close to the junction with Cross Square. It is located within St David's Conservation Area and Retail Centre as defined by the Local Development Plan (LDP 2). Nos 11-13 are the centre properties of this listed terrace. The premises are currently used as a guesthouse. Both the neighbouring properties are residential in nature. There is a further guesthouse at no 7 Nun Street, the Gin Kitchen restaurant is located at No. 16 Nun Street, almost directly opposite the application site, and there is an Indian takeaway at No 20 Nun Street, which is on the opposite side of the street, approx. 40m to the north of Nos 11 and 13.

Further south of the site, towards Cross Square, there are retail outlets, a café, and a public house.

### Current Proposal

The proposal comprises:

- The mixed use of 11-13 Nun Street as bed and breakfast and to house part of the gin distillery plant that is required for processing gin distillations. This application is a re-submission of a previously refused application, ref NP/23/0280/FUL.

It is proposed to house the gin still at the premises. The still is already in situ, however, it is not currently in use. It is proposed that the ethanol and botanicals would be stored off-site and brought onto the premises only when distilling is taking place. It is proposed that distillation take place on 30 days of any 12 month calendar year, and that the property would not be offering accommodation for guests on these days.

## 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 Access and Parking
- 2.5 Public Protection and Safety
- 2.6 Green Infrastructure

### 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 application is for a minor development. LDP2 Policy 1 (National Park Purposes and Duty) identifies that Proposals are permissible where they are 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 these qualities.

The policy also notes that due regard will be paid to the need to foster the economic and social well-being of the local communities within the Park, provided this is compatible with National Park purposes.

The application site lies within the centre boundary of St Davids and within its Retail Centres as defined by the Local Development Plan 2 (LDP). The property is also within St David's Conservation Area. Policy 5 (St David's Local Centre) identifies a number of land uses for the centre which includes permitting proposals for employment development to meet the needs of the local area; protecting and enhancing the district shopping centre and community facilities and ensuring that developments permitted contribute to the protection and enhancement of the City's special qualities.

Policy 57 of the LDP2 relates to Town and District Shopping Centres. It states that within the town shopping centre of Tenby, and the district shopping centres of Saundersfoot, St Davids and Newport, and other smaller shopping centres changes of use, redevelopment or development of new buildings will be permitted where:

- a) if the town or district shopping centre the proposal falls within Class A1, A2, A3, B1, C1, D1, or D2 of the use classes order or is a sui generis use normally found in such shopping centres;
- b) if in a Rural Centre the proposal is for retail or commercial uses (A1, A2, and A3 uses) or community facilities; and
- c) if it is located within a primary frontage (see Tenby Inset on the Proposals Map), the proposal would not create a concentration of non-retails uses; and



- d) the scale, siting and design is appropriate and would contribute to the character and appearance of the area; and
- e) proposals for A3 uses would not individually or cumulatively cause an unacceptable adverse effect on amenity (see Policy 30) or the role of the Centre in meeting the needs of local communities and visitors.

The previous application considered that the gin distillery use of the property would be classed as B2 general industrial use by virtue of the volume of proposed distilling and the number of operation days. The current proposal reduces the number of operational days and the scale of the distilling. As such, the proposed ground floor use can now be considered as B1 in the Use Classes Order. B1 c) states such use as for any industrial process, being a use which can be carried out in any residential area without detriment to that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

Whilst a B1 use may be acceptable within a residential area, it is not considered that this proposal is appropriate given the health and safety implications associated with the presence of a highly flammable substance. Whilst it is proposed to store the ethanol off-site when distilling is not taking place, and that distilling would be limited to 30 days per calendar year, and for 4 hours on those days, the Authority would wish to impose a number of controls in the form of conditions to ensure that this was the case.

Welsh Government Circular 016/2014 “The Use of Planning Conditions for Development Management” states at paragraph 1.2 that *the objectives of planning, however, are best served when that power is exercised in such a way that conditions are clearly seen to be fair, understandable, reasonable and practicable.*”

Paragraph 3.1 refers to case law providing general criteria for the validity of planning conditions (Newbury DC V Sos for the Environment (1981) A.C 578), and that conditions must meet six tests. Those tests are that conditions are:

- i) necessary;
- ii) relevant to planning;
- iii) relevant to the development to be permitted;
- iv) enforceable
- v) precise; and
- vi) reasonable in all other respects

Paragraph 3.18 of the Circular states that a condition should not be imposed if it cannot be enforced. Paragraph 3.22 further states that a condition will be unenforceable because it is, in practice, impossible to detect a contravention. In this case, the Authority would require the applicant to confirm the exact dates on which gin distillation would take place in any 12 month calendar year. Should these dates change in any calendar year, the applicant would still be required to provide that information. In addition to this, the applicant would be required to share booking details with the Authority to ensure that no bookings are in place on the days that distillation is to take place. Furthermore, in order to enforce any condition requiring this information, the Authority would need to carry out regular inspections, not only on days when distillation is proposed to take place, but also during times when it is not. This would not be considered practicable given the resources required to carry out such inspections. It is considered therefore, that any such condition(s) would be contrary to the provisions of paragraph 3.18 of WG Circular 016/2014.

Overall, whilst the principle of a B1 use would be considered acceptable in a residential area, it is considered that the conditions required to render the proposal acceptable would

be impractical, unreasonable, and unenforceable. As such, it is not considered that the development is appropriate in this context.

## 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 14 seeks to prevent development which would introduce or intensify a use which is incompatible with its location.

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

As previously noted, this application is a resubmission of a previously-refused application. The application was refused on the grounds of unacceptable impact upon residential amenity, and for health and safety reasons.

As part of this submission, the scale of distilling is proposed to be lessened. The planning statement notes that the distillation process would be avoided during peak tourist times and would only take place on 30 days of any calendar year.

It is recognised that it would be possible for the Authority to apply a condition restricting the use of the still to the hours, and amount of days per calendar year as suggested by the planning statement, however Officers have a fundamental concern regarding the reasonableness and enforceability of any such conditions since they would require the B&B to provide details of all bookings, and inspections to be carried out by Officers.

The design details of the proposal would result in residential accommodation being directly above the gin distillery, in conflict with advice from PCC's Health and Safety Officer (set out in detail below). Amending this use would require a fundamental re-design and therefore the design as proposed is not considered to be well designed in terms of community cohesion and health. This is contrary to the requirements of Policy 29 Sustainable Design criterion c.

As the development property is within the St Davids Conservation Area, and is a Listed Building, the Buildings Conservation Officer has been consulted. No objections are raised in terms of the impact upon the character and appearance of either the Conservation Area, nor the Listed Building.

In introducing a use which is incompatible with its location and a design which does not adequately address matters of health, the proposal is considered not to be in accordance with Policies 14 and 29 of the adopted Local Development Plan 2.



### 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.

Some of the third part concerns raised are in relation to the licensed bar, which is already in situ, and how this would impact upon residential amenity. It should be noted however, that confirmation has been received from the applicant's agent that the bar is for the use of residents only. In addition, a bar would be considered ancillary to a Bed and Breakfast, and therefore, it is not deemed that planning consent would be required for its creation.

As part of this application, it is proposed to introduce a B1 use into the premises. Namely, the distilling of gin. Application NP/23/0280/FUL was refused by the Development Management Committee. There were concerns that the intensification of the use of the premises would have had an unacceptable impact upon residential amenity. It was proposed to hold events at the premises such as "make your own spirits", afternoon G & Teas, and wedding parties. It is acknowledged that the harm to residential amenity has been somewhat minimised by this omission. However, in order to avoid the risk associated with the presence of a highly flammable substance within a residential setting, conditions would be required. These conditions would include the need for the applicant to submit a distilling schedule, specifying the exact 30 days per year; and every year if those 30 days were to change, the exact length of time it would take to complete the distilling process, and, the submission of booking records to ensure that the process would not take place when guests are present within the premises. In addition, to this, regular inspections of the premises would need to take place. Having regard to the level of conditioning required, and the lack of enforceability, it is not considered that it is appropriate to impose those conditions, thus, as a result, the proposal is deemed inappropriate, and contrary to Policy 30 of the Local Development Plan.

### 2.4 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.

This part of St Davids is located within Parking Zone 1. Whilst several of the representations received raise concerns regarding problems relating to parking, highway safety issues caused by deliveries to the property, Parking Zone 1, as identified within the adopted

Supplementary Planning Guidance for Parking Standards, does not require parking for new development. It is noted however, that there is a car park within 110 metres of the premises.

Overall, there are no concerns as to the impacts of traffic. The proposal meets the requirements of Policy 59 and 60, however this does not outweigh other policy conflicts identified.

## 2.5 Public Protection and Safety

Paragraph 3.21 of Planning Policy Wales 12 states that *The Planning System must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity*”.

As part of the consultation process involved with the application, the Public Protection Team has been consulted on the application. No comments have been received. However, it should be noted that the previously-proposed commercial kitchen is now omitted from the scheme.

One of the main concerns raised by third parties is the potential for health and safety issues caused by the presence of ethanol on the site.

The Authority has consulted with the Health and Safety Executive (HSE). A consultation response has been received in relation to Hazardous Substance Consent, and states that a formal application for Hazardous Substance Consent for the site must be made through the hazardous substance authority (HSA), which is usually the Local Planning Authority. It should be noted that this consent does not form part of planning legislation, and is a separate consent over which the Local Planning Authority has no control. Rather, this would be controlled by Pembrokeshire County Council.

Having regard to the fact that the Health and Safety enforcement would fall to the Local Authority (Pembrokeshire County Council), the Health and Safety Area Officer has been consulted on this application. The Officer has made the following comments:

*Normally the alcohol distillation would be enforced by the HSE. However as the main activity of this particular premises is a guest house, the Health and Safety enforcement would fall to the Local Authority*

*These are points that need to be considered in installing of a small scale gin production within the guest house at 11-13 Nun street, St. Davids*

- i) Ethanol – the primary component of gin – is a highly flammable liquid*
- ii) The relevant legislation for fire and explosion risks in gin manufacture is The Dangerous Substance and Explosive Atmosphere Regulations (DSEAR). DSEAR has a specific requirement to assess risks and implement suitable measures.*
- iii) People should be kept away from areas where flammable material is being stored and/or used. Stills should be located well away from other work activities, preferably in a dedicated building or room. Access to the area should be minimised and limited to those specifically involved in the processing activities*
- iv) If it is necessary for persons not directly involved in the distillation process to enter the area, this should only be permitted when the distillation equipment is shut down and emptied of any spirit. This includes members of the public.*
- v) Rooms containing stills should be provided with good ventilation by either natural or forced means.*

- vi) ***Sleeping accommodation should not be permitted above the distilling room.***
- vii) ***The application states that it is proposed to use the still for only 30 days in any 12-month period, making the operation small scale and compatible with the character of the site within which it is located. It is proposed that the 30 days would avoid the busier holiday periods of May, June, July and August and the whole property would be closed to residents on the days that the still was operational. This would reduce the risk to residents and non-employees.***

Whilst the applicant has stated that no guests would be present at the bed and breakfast during the distillation process, and the Health and Safety Area Officer notes that this would reduce the risk to residents and non-employees, the rooms directly above that which houses the still, are bedrooms. In order that the Authority could control the proposed development satisfactorily the scheme would essentially need to either be re-designed or a number of control measures would need to be included in the form of planning conditions.

As noted in section 2.1 of this report, any such conditions would not be practicable or enforceable. As such, they would not satisfy the requirements set out in Welsh Government Circular 016/2014.

In not adequately addressing public safety, the proposal is considered contrary to the provisions of Planning Policy Wales Edition 12.

## 2.6 Green Infrastructure

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.

No green infrastructure statement has been received with this application, and no green infrastructure is shown on the submitted drawings. Therefore, the proposal cannot be said to result in a net benefit for biodiversity. As such, the proposal is contrary to Planning Policy Wales Edition 12 (2024) and Policy 11 of the adopted Local Development Plan.

## 3 Conclusion

In introducing a use which is incompatible with its location and a design which does not adequately address matters of health, the proposal is considered to be contrary to Policies 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and 29 (Sustainable Design) of the adopted Local Development Plan 2.

Officers have given careful consideration as to whether or not it was possible to use planning conditions to achieve a development which adequately addresses matters of health and safety. Having regard to the level of conditioning required, and the lack of enforceability, it is not considered that it is appropriate to impose those conditions, thus, as a result, the proposal is deemed inappropriate, and contrary to Policy 30 of the Local Development Plan. In not adequately addressing public safety, the proposal is considered contrary to the provisions of Planning Policy Wales Edition 12.

Overall, there are no concerns as to the impacts of traffic. The proposal meets the requirements of Policy 59 and 60, however this does not outweigh other policy conflicts identified.

No green infrastructure statement has been received with this application, and no green infrastructure is shown on the submitted drawings. Therefore, the proposal cannot be said to result in a net benefit for biodiversity. As such, the proposal is also contrary to Planning Policy Wales Edition 12 (2024) and Policy 11 of the adopted Local Development Plan.

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**

**REFUSE**, for the following reasons:

1. In introducing a use which is incompatible with its location and a design which does not adequately address matters of health, the proposal is considered to be contrary to Policies 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and 29 (Sustainable Design) of the adopted Local Development Plan 2.
2. In the opinion of the Local Planning Authority, the proposed development would result in harm being caused to residential amenity due to the requirement of planning conditions which would be considered unenforceable and impracticable, contrary to Welsh Government Circular 016/204, and Policy 30 (Amenity) of the Pembrokeshire Coast National Park Local Development Plan (2020).
3. Due to the lack of proposed green infrastructure, the proposal would not result in a net benefit for biodiversity and would therefore be contrary to Planning Policy Wales Edition 12 (2024) and Policy 11 (Protection of Nationally Protected Sites and Species) of the adopted Pembrokeshire National Park Local Development Plan (2020).