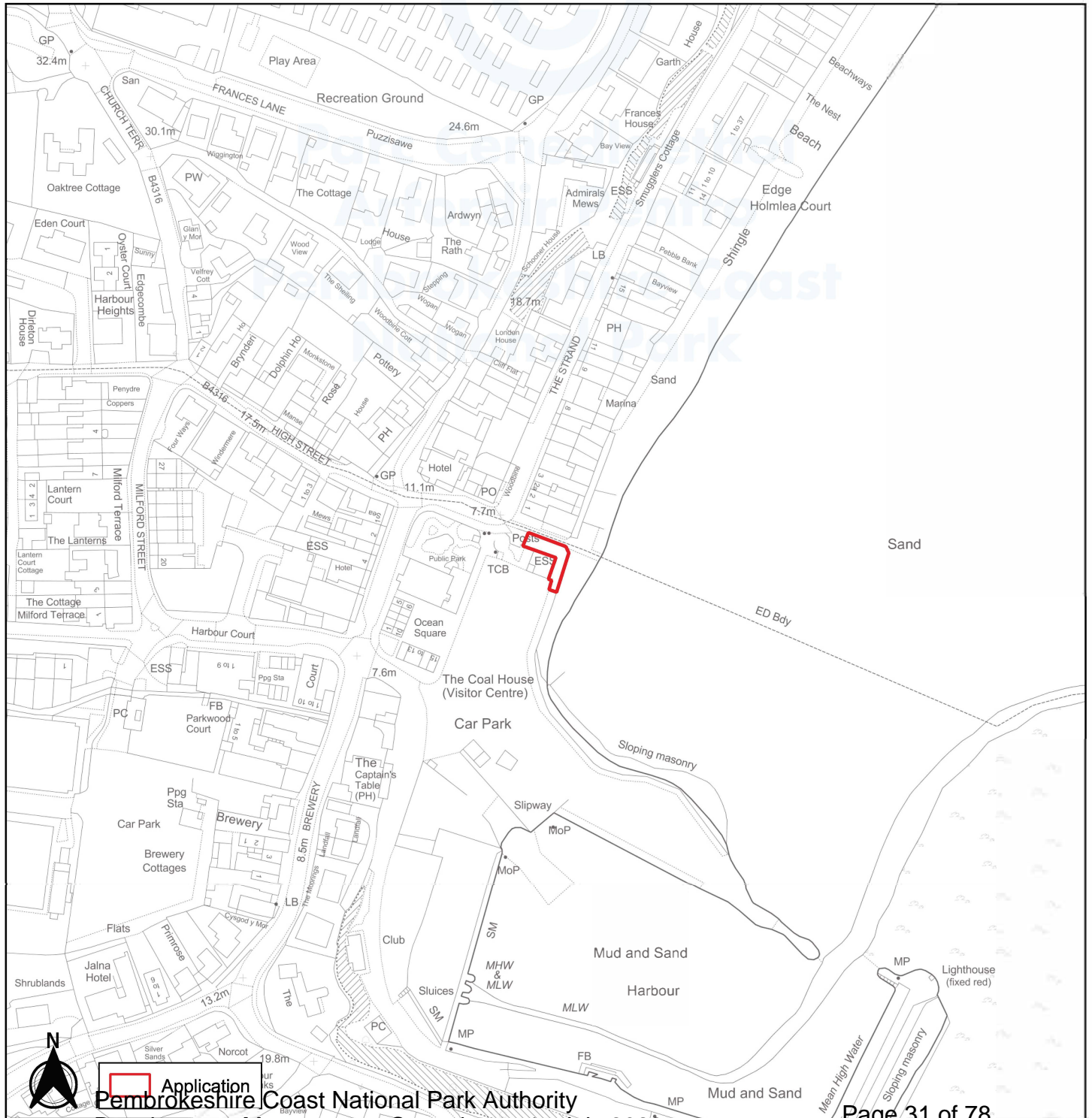


Saundersfoot Harbour,
Saundersfoot
Pembrokeshire
SA69 9HE



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500



Application
Pembrokeshire Coast National Park Authority

Development Management Committee - 15 July 2026



PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY DELEGATED DECISION REPORT

Ref No: NP/26/0145/FUL
Proposal: 1 small timber woodfire sauna and associated booking hut
Site Location: Saundersfoot Harbour, Pembrokeshire, SA69 9HE
Recommendation: Approve, subject to conditions

The application is being brought to the Development Management Committee in accordance with the scheme of delegation, as it has been called in by a member of the Authority.

Summary

The site is located in Saundersfoot Harbour, on the public footpath that runs east of the car park. Within this area, there are several retail and food outlets, including the units at Ocean Square, an ice cream booth and the Spar store. The site is also located within Saundersfoot's designated Conservation Area and the Coastal Change Management area identified in the National Park Local Development Plan 2 (LDP2).

The current application proposes retaining 1 small timber wood-fired sauna and a new associated booking hut, both located within Saundersfoot Harbour.

The application, in its current form and with the proposed location of the sauna, is considered to result in a landscape impact that harms the setting of the Saundersfoot Conservation Area. The sauna is also located in a position which reduces public access along the existing promenade route, which is considered to prevent appropriate access from being achieved. In addition, since the temporary permission was granted Technical Advice Note 15 has been updated and there is now a requirement for a Flood Consequences Assessment in this location. The lack of a suitable Flood Consequences Assessment results in insufficient information to support the current application.

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

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

Consultee Response

- Saundersfoot Community Council: No objection
- PCC Coastal and Rivers Engineer: No adverse comments
For the short term in relation to Shoreline Management Plan
- Natural Resources Wales: No objection,
Questions regarding the content of the FCA
- PCNPA Buildings Conservation Officer: Refusal
- PCNPA Ecologist: No adverse comments raised
- PCC Public Access Officer: No response to date

Public Response

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

19 letters have been received, which raise the following aspects:

- Support permanent consent, but not in the current location, as it obstructs the view of the beach from the promenade.
- The sauna is a major asset to the village, attracting visitors and creating a centre for wellbeing.
- The sauna provides an excellent and much-needed facility to visitors and residents alike. It is a fantastic service that draws visitors to our vicinity. The look and feel of the sauna enhances the vista of our harbour side.
- Hwyl Outdoor Sauna isn't just a business; it's a wellness landmark for Saundersfoot.
- The sauna is a great asset to the village, boosting locals' and visitors' well-being and mental health.
- A unique offering that attracts visitors to the beach and harbour.

The above comments have been considered within the report below.

Policies considered

Development Plans

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

Future Wales: The National Plan 2040 [Future Wales: The National Plan 2040](#) (FW)

Local Development Plan 2 (Adopted September 2020)

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

- Policy 01 (National Park Purposes and Duty)
- Policy 04 (Saundersfoot Local Centre)
- Policy 08 (Special Qualities)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 17 (Shore Based Facilities)
- Policy 18 (Porthgain, Saundersfoot, Solva and Tenby Harbours)
- 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 38 (Visitor Economy)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

Planning Policy Wales (PPW12)

PPW12 sets out the Welsh Government's land-use planning policies.

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.

- [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 6 – Planning for Sustainable Rural Communities
- TAN 12 – Design
- TAN 13 – Tourism
- TAN 14 – Coastal Planning
- TAN 15 – Development, flooding and coastal erosion
- TAN 23 – Economic Development
- TAN 24 – The Historic Environment

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, which may be material considerations in the determination of any future application.

In respect of the proposal, the most relevant SPGs are: [Supplementary Planning Guidance \(LDP2\) - Pembrokeshire Coast National Park](#)

- SPG - Biodiversity
- SPG - Landscape
- SPG - Seascapes
- SPG - Sustainable Design and Development
- SPG – Conservation Areas
- SPG – Coal Works - Instability

Constraints

- Conservation Area Saundersfoot
- LDP Coastal Risk Area
- Technical Advice Note 15_c2
- Special Area of Conservation - within 500m
- Special Protection Area - within 500m
- Site of Special Scientific Interest - within 50m
- Rights of Way Inland - within 50m
- ROW Coast Path - within 10m
- Recreation Character Areas
- Surface Coal
- High Coal Risk
- Affordable Housing Submarkets
- Seascape Character Areas
- Within Site of Special Scientific Interest consult NRW / Planning Ecologist_20m
- Landscape Character Area
- Special Area of Conservation - within 50m
- Flood Zone 3
- 200m from Site of Special Scientific Interest consult NRW / Planning Ecologist
- LDP Centre Boundary
- LDP Harbour Area
- LDP Harbour Area

- Conservation Area

Officer's Appraisal

1. **Site and Proposed Development**

The site is located in Saundersfoot Harbour, on the public footpath that runs east of the car park. Within this area, there are several retail and food outlets, including the units at Ocean Square, an ice cream booth and the Spar store.

The site is located within Saundersfoot's designated Conservation Area, and is also within the Coastal Change Management area identified by the National Park Local Development Plan 2 (LDP2).

The current application proposes retaining 1 small timber wood-fired sauna and a new associated booking hut, both located within Saundersfoot Harbour.

2. **Relevant Planning History**

- NP/24/0155/FUL - A temporary change of use of land to accommodate a mobile sauna. Three potential positions have been identified, to take account of high tides and storms, whereby the position of the sauna may need to change – Approved, for temporary consent for 2 years.

3. **Key Issues**

The application raises the following planning matters:

- 3.1 Policy and Principle of Development
- 3.2 Impact on the Conservation Area
- 3.3 Siting, Design, and Impact upon the Special Qualities of the National Park
- 3.4 Amenity and Privacy
- 3.5 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 3.6 Access
- 3.7 Surface Water Drainage

3.1 **Policy and Principle of Development**

52. 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).
53. 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) 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...*'.
54. 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.

55. 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.
56. The proposed site lies within the Centre Boundary of Saundersfoot Local Centre as defined by Local Development Plan 2. Policy 4 of LDP2 sets out the land use priorities for Saundersfoot and include permitting proposals for small scale employment opportunities to meet the needs of the local area, to protect and enhance the district shopping centre and community facilities to meet the need of the local area and visitors, to ensure developments permitted contribute to the protection and enhancement of the village's special qualities, to protect and enhance the harbour and to assist Saundersfoot in preparing for and adapting to coastal change.
57. Policy 38 of the Local Development Plan relates to visitor economy and sets out development which would be permissible to attract visitors to the National Park outside of the season. These include: e) Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. The principle of development within the Centre boundary is established by policy 4 and policy 38, subject to detailed consideration of any impact on the special qualities of the village and the proposals compatibility with coastal change policies.
58. Policy 18 of LDP2 seeks to control development within the identified harbour areas, including Saundersfoot and will support development in these areas provided that it sustains harbour activities and it conserves or enhances the existing character of the harbour.
59. The sauna was granted a temporary two-year permission for the change of use of land to accommodate the sauna in 2024. This application seeks permission for the permanent siting of the sauna and associated booking hut, which is located in the carpark to the southwest of the sauna's current location.
60. The temporary permission was in part to assess if there were any unacceptable impacts on access, as the sauna is located in an area used frequently by people accessing the beach or to view the seascape. In particular, policy advice called for careful consideration to ensure that the sauna did not impede access, particularly for wheelchair and mobility aid users.
61. Whilst the Officer report for the application for the temporary permission (see Officer Committee report NP/24/0155/FUL) stated that the sauna would be seen in the context of existing development and therefore no unacceptable adverse effects on the qualities and special landscape and seascape character of the National Park, this application also includes further development in respect of a booking office (in retrospect) and therefore the amount of development in this application exceeds that of the temporary permission.
62. The Committee minutes of the decision NP/24/0155/FUL note that in discussion some Members expressed concerns regarding the position of the structure on the pathway in a busy location, the visual impact and amenity of visitors and also the health risk to users. A temporary use was proposed to allow the impact of the structure in relation to access, visual impact and flood risk to be assessed, before any permanent permission

was considered. Following consideration of the implementation of the temporary permission and given the greater extent of the current proposal, it is considered that the visual impact of the sauna and related booking office has now increased and could be reduced by locating the sauna further back in the car park. This would also have the benefit of the sauna not requiring relocation during severe weather and increased flood risk.

63. Officers do consider that the proposal for the sauna and booking office is acceptable in principle within a Centre location. However, it is considered that an alternative location further back in the adjacent car park area would be more appropriate within the context of the local area. Therefore, the visual impact that the sauna currently has on this area and the promenade, which affords many key panoramic sea views over the adjacent beach, is such that it will form a reason for refusal of the current application.

3.2 Impact on the Conservation Area

64. 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.
65. The National Park Conservation Area SPGS, [Our Conservation Areas - Pembrokeshire Coast National Park](#), is relevant to the application. The maps within the SPGs define character areas, key buildings, positive buildings, special views, vistas, etc., against which development proposals can be weighed. The setting of a CA can be a material consideration - both for developments in close proximity to the boundary and for larger developments within the wider setting, as mapped in the SPGs as 'important outlying areas'.
66. The site is located within the Saundersfoot Conservation Area and within the large open space historically comprising the railway plane and goods yard fronting the colliery office. The latter survives as the heritage centre, and whilst the yard is now predominantly car parking, the sense of the historic open space remains strong.
67. The adopted SPG identifies many features and buildings that contribute to the special character which forms the Conservation Area of Saundersfoot. The SPG also identifies the harbour area as an essential open area, and within this area, there are key views towards important buildings and local landmarks, as well as panoramic sea views from the promenade along the seafront.
68. A small-scale sauna is not considered alien to such a location; the character of the Conservation Area is arguably preserved by such a use.
69. In terms of appearance, the site is highly prominent and part of the widely used seafront walk, which is effectively a public realm. The appearance of the immediate area - a car park behind a 'promenade' has been altered over the years, but still preserves the open character of the coal harbour and its former railway plain/yards overlooked by the former coal office, which still remains prominent.
70. The permanent placement of a sauna structure in such a prominent location cannot be considered to preserve or enhance the appearance of the conservation area. An alternative site further back within the car park area is considered a better option by officers.

71. As such, the concerns raised due to its current location and the degree of permanency are such that the current application detracts from the defined essential open area, the fine landscape setting when viewed from key views within the promenade area and prominent views into the conservation area from the sea. As such, officers consider these aspects to be a further reason for refusal.

3.3 Siting, Design, and Impact upon the Special Qualities of the National Park

72. 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. Special qualities relevant to consideration of this application include: The identity and character of towns and villages are not lost through poor design and layout of development and is wherever possible enhanced; the historic environment is also protected and, where possible, enhanced.
73. 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.
74. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
75. The application site falls within the Landscape Character Area of Saundersfoot Settled Coast (LCA1) and also the Seascape Character Area of Carmarthen Bay West (SCA40).
76. The Landscape Character for this area describes the special qualities to include Saundersfoot, which has a Conservation Area centred on the old town area along the sea front and the harbour. Management guidance indicates a need to conserve the traditional buildings along the Saundersfoot seafront, around the harbour, and in the town centre. In addition, conserve the important archaeological sites, especially the tramway and incline, to retain their integrity and visual context.
77. The Seascape Character for this area describes the area as comprising an indented coast with small headlands and accessible beaches seen against a hill and valley rural backcloth. The focus is on Saundersfoot, which is a small resort, and the area is popular for beach and marine recreation. Development pressures are focused on Coastal Splendour, distinctive settlement character, and cultural heritage.
78. The current application through the proposed sauna structure location is considered to raise concerns with landscape impact and will result in unacceptable impacts on the place and local distinctiveness of this area of Saundersfoot, and is considered to be unsympathetically sited within the landscape, resulting in the identity and character of this part of Saundersfoot village not being maintained or enhanced. The development will also not protect or enhance the historic environment of this area, as identified in the report above, with its impact on the appearance of the Saundersfoot Conservation Area.

79. As such, based on the above concerns raised, the proposed development fails to accord with policies 08, 14 and 29 of LDP2.

3.4 Amenity and Privacy

80. 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.

81. The current proposal is considered to comprise a small sauna structure and associated booking office, both located within the northeast corner of Saundersfoot Harbour, adjacent to the sea wall and main beach slipway that leads from the Strand down to the beach. The sauna structure is proposed in a location that currently forms part of an important public promenade that extends around this part of Saundersfoot Harbour and provides access to the harbour and its car park, whilst also allowing a view out over the beach and towards the seascape of Saundersfoot Bay.
82. The sauna as proposed in this location is considered to result in visual intrusion, as the location blocks important key views from the existing promenade out to the beach and sea and also narrows the view of these areas when viewed from the end of the adjacent Strand Road and also from parts of High Street.
83. Based on the above concerns, officers consider that the current proposal for the retention of the sauna structure in its current location will result in a development which is considered to affect public amenity and be visually intrusive. As such, the proposal will not accord with Policy 30 of LDP2.

3.5 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity impacts

84. PPW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 require 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.

Protected Species

85. The Authority's Ecology Team has indicated that it has been assessed that the proposed application will not impact protected species that may be present in the vicinity.

Landscape Impact

86. The development is situated within the Pembrokeshire Coast National Park. Natural Resources Wales (NRW) notes that there is no information regarding landscape assessments with the application, and therefore, they assume that the National Park Authority has assessed these directly. The report above has considered landscape impacts resulting from the proposal in detail.

Net Benefit for Biodiversity and Green Infrastructure

87. 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 and that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being.
88. 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.
89. 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.
90. Due to the location of the proposed development on an area of hardstanding, the small-scale size of the proposals and the limited redline ownership, Green Infrastructure and Net Benefits for Biodiversity are limited, but a small-scale planter could potentially be introduced by condition if approval was granted.

Protected Sites - Sites of Special Scientific Interest (SSSI)

91. The *Wildlife and Countryside Act 1981 (as amended)* places a duty on public authorities in exercising their functions, so far as this is likely to affect the flora, fauna, geological or physiographical features of a Site of Special Scientific Interest (SSSI), to take reasonable steps consistent with the proper exercise of their functions to further the conservation and enhancement of those features.
92. Additionally, Paragraphs 6.4.25 & 6.4.26 of PPW12 relate to developments in or in close proximity to Sites of Special Scientific Interest (SSSI), with 6.4.26 stating that *'There is a presumption against development not within a SSSI but likely to damage SSSI. In such cases, proposals must be carefully assessed to ensure that the effects on the nature conservation interests intended to be protected by the designation are understood, and development should be refused where there are adverse impacts on the features for which the site has been designated. International and national responsibilities and obligations for conservation should be fully met, and consistent with the objectives of the designation, statutorily designated sites should be protected from damage and deterioration, with their important features conserved and enhanced and the capacity for restoration demonstrated by and through appropriate management.'*
93. The site in question is in proximity to an SSSI (Saundersfoot Beach), and is considered a constraint on this development; as such, NRW and the PCNPA Ecologist were consulted on this. Neither consultee raised any concerns regarding potential adverse impacts on the adjacent SSSI. Officers therefore consider that, given the nature of the current proposal and its small scale, no impact on the SSSI is envisaged from the development.

Habitat Regulations Assessment

94. SACs and SPAs are of European importance. Under the *Conservation of Habitats and Species Regulations (2017)* (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions.
95. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SAC or SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features, consult NRW and have regard to NRW's representations.
96. The application site is within or close to the boundary of the Carmarthen Bay and Estuaries Special Area of Protection (SAC). As a competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), PCNPA have to consider the impacts of development on the features for which the European site is designated and, where necessary, undertake a Test of Likely Significant Effect (TLSE). However, it is considered that this development proposal is unlikely to impact the SAC features. The nature of the development, the proximity to the SAC, and the surrounding topography mean there are no direct pathways for pollution.
97. It is considered not likely that the development will cause any adverse effects, including sediment transfer and deposition, turbidity, noise, visual presence, physical disturbance, and nutrient transfer. There will be no reduction in the area of the habitat within the SAC, and there will be no direct or indirect change to the physical quality of the environment (including the hydrology) of the habitats within the site. It is unlikely that there will be any ongoing disturbance to species or habitats for which the site is notified or changes in species composition or population size of any feature, and there is no direct pathway to adverse effects.
98. Therefore, on this occasion, a full TLSE has not been undertaken as no pathway for impact on the SAC is considered likely.
99. Given the detailed consideration above on Biodiversity, Green Infrastructure & Landscaping and Protected Sites, the current application is considered to accord with Policies 10 and 11 of LDP2 and compliance with the requirements of the Environment Act (Wales 2016), the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations (2017).

3.7 Access

100. Policy 59 (Sustainable Transport) of LDP2 permits development where it is well designed by providing appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate. Additionally, Policy 60 (Impacts of Traffic) of LDP2 permits development where appropriate access can be achieved, and potential transport impacts can be satisfactorily mitigated.
101. The current application is considered to retain a form of access along the promenade for pedestrians, including wheelchairs, pushchairs, and prams, albeit the existing wide promenade is greatly reduced in width to pass the proposed Sauna structure in that area, with a clear width of at least 1.2 metres being retained when the Sauna is located in its most prominent location. This creates a pinch point between the Sauna

and an existing light column and restricts wheelchair, pushchair, and pram users' ability to pass each other easily at this pinch point. However, officers note that once those users pass this pinch point, there is ample space for passing.

102. Traffic in the context of LDP2 is considered to include all forms of motor vehicle, as well as pedestrian movement.
103. The proposed sauna structure location is considered by officers to retain some pedestrian access along the promenade in this location, but it does reduce the passing width significantly for pedestrians. Given that access is significantly reduced when passing the proposed sauna structure, officers consider that the development is not well designed in its siting for pedestrians and is therefore contrary to criterion c) of Policy 59 and, criterion a) of Policy 60 of LDP2.

3.8 Surface Water Drainage

104. 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.
105. The PCC Coastal, Rivers and Drainage Team indicates that the South Wales Shoreline Management Plan (SMP) 2 and policy unit under paragraph 16.7 covers development in this location. The SMP states that the short- and medium-term policy is to Hold the Line (HTL), in which existing coastal defences are to be maintained for as long as is sustainable and affordable. The longer-term policy is to move to Managed Realignment (MR), where adaptation and flood resilience measures would be required. Flood and coastal erosion risks to property, assets, and infrastructure will continue to increase over time, and this should be taken into account.
106. Since the temporary application was approved Technical Advice Note 15: Development, Flooding and Coastal Erosion has been updated by Welsh Government. As a result of this update, a Flood Consequences Assessment (FCA) is required to support a planning application for any development proposal located fully or partly in Surface Water and Small Watercourses - Flood Zones 2 and 3. The LPA had requested an FCA to support the current application in line with TAN 15 requirements.
107. The FCA should establish if suitable avoidance and mitigation measures can be incorporated, in a manner compatible with the placemaking aims of Planning Policy Wales, within the site design to ensure that development is safe and there is:
 - minimal risk to life;
 - minimal disruption to people living and working in the area;
 - minimal potential damage to property;
 - minimal impact of the proposed development on flood risk generally; and
 - minimal disruption to the sustainable management of natural resources.
108. To inform their planning decision, the local planning authority will need to arrive at a judgement on the acceptability of the flooding consequences, and it should only permit development where the developer has demonstrated that the risks and consequences of flooding are manageable and meet the criteria set out within TAN 15.

109. An FCA was submitted, which has been assessed by officers and Natural Resources Wales (NRW), and both recognise that the submitted FCA falls short of the requirements as set out in TAN 15.
110. Within the FCA, the site is shown to be in Flood Zones 2 and 3 (Sea) and within recorded flood extents and thus would not comply with Figure 5 of TAN 15 (2025). In addition, there is no indication of ground level or finished floor level. However, the FCA states in section 5.3 that the flood risk would reach depths between 0.5m and 2m and therefore would not comply with Figure 6 of TAN 15 (2025). No source of information has been provided for this depth, and therefore, officers and NRW are unable to verify the accuracy of this data. The development is also in a known area for wave overtopping; however, no detailed assessment of overtopping has been undertaken within the FCA.
111. However, NRW also indicates that the planning application proposes less vulnerable development, namely a sauna and associated booking hut. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea / Recorded Flood Extents). Given the scale and nature of the proposed development, NRW consider that the proposals could be acceptable in respect of flooding, subject to the developer being made aware of the potential flood risks and consequences. NRW would also expect the developer to take the opportunity to incorporate flood-resilient design where feasible.
112. Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience. Natural Resources Wales provides advice on their website - Preparing for a flood, which may be useful for the developer or occupant of the proposal.
113. Therefore, based on the information received to date in respect of the supporting FCA, the application fails to meet the minimum requirements within TAN 15, and this will form an additional reason for refusal.

4. Conclusion

114. The application, in its current form, with the proposed location of the sauna, is considered to result in a landscape impact which harms the setting of Saundersfoot Conservation Area. The sauna is also located in a position which reduces public access along the existing promenade route, which is considered to prevent appropriate access from being achieved and result in a development which is not well designed for pedestrians. In addition, the lack of a suitable Flood Consequences Assessment results in insufficient information to support the current application.
115. 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.

5. Recommendation

Refuse subject to the following reasons:

1. The development is considered to be sited in a location which will have a detrimental impact on the character and setting of Saundersfoot Conservation Area in that the proposed sauna structure will detract from the defined essential open area within Saundersfoot Harbour and its fine landscape setting when viewed from key views within the promenade area and prominent views into the conservation area from the sea and therefore is contrary to Policies 04 (Saundersfoot Local Centre), 08 (Special Qualities), 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park.), and 18 (Porthgain, Saundersfoot, Solva and Tenby Harbours), 29 (Sustainable Design), and 30 (Amenity) of the Pembrokeshire Coast National Park Local Development Plan 2.
2. The siting of the proposed sauna on the promenade, which reduces the passing width in this location, is not considered to result in a well-designed development for pedestrian access and is therefore contrary to criterion c) of Policy 59 and, criterion a) of Policy 60 of Pembrokeshire Coast National Park Local Development Plan 2.
3. The application is supported by a Flood Consequences Assessment (FCA), which fails to address the required information as set out within Welsh Government Technical Advice Note 15 (TAN 15), and therefore, officers consider that there is a lack of information to ensure that the submitted FCA demonstrates that the risks and consequences of flooding are manageable and meet the criteria set out within TAN 15 (Development, Flooding and Coastal Erosion).