

Item 5 - Report on Planning Applications

Application Ref: NP/21/0215/FUL

Case Officer	Kate Attrill		
Applicant	Ms R Birt-Llewelin		
Agent	Mr M Bool, Oochitecture		
Proposal	Proposed conversion and extension of the existing barn into a three bedroom dwelling. Removal of the existing residential static caravan. Relocation of existing hay barn and replacement with a stable.		
Site Location	Bower Farm, Broad Haven, Haverfordwest, Pembrokeshire, SA62 3TY		
Grid Ref	SM86961349		
Date Valid	16-Mar-2021	Target Date	23-Jul-2021

The application is being brought back to the Development Management Committee following a site visit on the 21st June 2021.

Consultee Response

The Havens Community Council: Supporting - This planning application was fully supported with no objections at the meeting of the Havens Community Council held on 4 May 2021.

Dyfed Archaeological Trust: Conditional Consent

Coal Authority: No Objection subject to condition

Dwr Cymru Welsh Water: No adverse comments

Natural Resources Wales: No Objection

PCC - Drainage Engineers: Observations

PCC - Transportation & Environment: Supporting

PCNPA Planning Ecologist: Conditional Consent

PCNPA Tree and Landscape Officer: Conditional Consent

Public Response

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 requires that proposed developments are advertised by way of either neighbour letters or a site notice. In this case, both site notice and neighbour letters were sent.

No third party letters of representation have been received.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website -

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=549>

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 07 - Countryside

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

Pembrokeshire Coast National Park Authority
Development Management Committee – 21st July 2021

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LDP2 Policy 10 - Sites and Species of European Importance
LDP2 Policy 11 - Nationally Protected Sites and Species
LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park
LDP2 Policy 29 - Sustainable Design
LDP2 Policy 30 - Amenity
LDP2 Policy 46 - Housing
LDP2 Policy 48 - Affordable Housing
LDP2 Policy 59 - Sustainable Transport
LDP2 Policy 60 - Impacts of Traffic
MTAN Policy 02 - Coal
PPW11
SPG05 - Sustainable Design
SPG06 - Landscape
TAN 05 - Nature Conservation and Planning
TAN 12 - Design
TAN 23 - Economic Development
TAN 24 - The Historic Environment

Constraints

Safeguarding Zone
Hazardous Zones
Recreation Character Areas
Surface Coal
High Coal Risk
Affordable Housing Submarkets
Seascape Character Areas
Landscape Character Area

Officer's Appraisal

Site and Context

The site lies to the south east of Broadhaven accessed down a private track which also serves the main house, a guesthouse, and a campsite which has recently had a certificate of lawfulness for its amenity block approved.

Relevant Planning History

NP/20/0512/FUL Proposed renovation and conversion of the existing barn into a one-bedroom holiday let. Removal of the existing caravan and erection of a new 2-bedroom dwelling over the footprint of the barn/caravan. Demolition of existing hay barn and replacement with a stable. Withdrawn

Description of Proposal

The application proposes to convert and extend the existing stone barn with a first-floor pitched roof extension. An earlier application in 2020 was withdrawn due to it being unable to be supported on design grounds.

The current application has revised the roof shape of the previous proposals but has not reduced the scale of the conversion.

A three-bedroom, part two storey building is proposed with a pitched roof gabled on the east elevation to the first floor with a first-floor balcony on the south elevation.

A large utilitarian, modern box profile barn is to be removed and a two-bay stable is proposed on the eastern side of the barn with separate access to the south east.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Access and Parking
- Landscaping
- Biodiversity
- Land Drainage
- Other Material Considerations: Coal Authority, Dyfed Archaeology, Conservation Officer consultation

Policy:

The site is outside of any the Centres defined in LDP2 and therefore Policy 7 of the Plan is relevant. Within the context of strictly controlling new development in the countryside, this policy sets out the types of developments that may be permitted. It includes the conversion of appropriate buildings to a range of uses, with priority being given to market housing in residential conversions.

The building may be converted to full residential use and in accordance with Policy 48 of LDP2 a commuted sum charged to help provide for off-site affordable housing provision. The Authority's Supplementary Planning Guidance on affordable housing sets out the amount as £100 per square metre of floor space. A Unilateral Undertaking was received from the applicant's agent on the 18th May 2021.

The replacement of the barn structure with a new-build dwelling would not be supported by the policies set out in LDP2 which sit within the context of national planning policy. Paragraph 3.56 of Planning Policy Wales directs development in the countryside to settlements and states that:

"...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled."

The subtext for Policy 7 which is the main LDP Policy referring to conversion proposals in the open countryside says:

4.45 National planning guidance refers to buildings needing **‘to be of a form, bulk and general design which are in keeping with their surroundings’**. In this National Park these are considered to be those that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape. Their interest and charm stems from an appreciation of the functional requirement of the building, their layout and proportions, the type of building materials used (including those constructed of stone, clom and slate), and their display of local building methods and skills. **Conversion must not result in an unacceptable adverse effect upon the structure, form, character or setting of the building.**

Policy 7 also requires that proposals for conversion are accompanied by a structural report to show how they can be converted without the need for substantial demolition and re-building. A structural report has been received which illustrates that sections of the building will be able to be retained.

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

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan 2 (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.

Policy 14 of the LDP2 seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant visual intrusion and/or, that would be introducing or intensifying a use which is incompatible with its location. Criteria (c) and (d) resists development that would fail to harmonise with or enhance the landform and landscape character of the National Park and/or fails to incorporate important traditional features.

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

Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. Policy 9 seeks to conserve that character and limit the impact of lighting which could negatively impact on the special qualities of the National Park.

The applicants have revised the scheme for conversion since its original submission under NP/20/0512/FUL. Informal advice was sought as to how the scheme could be altered to make it acceptable, and the following advice was sent:

‘If you were to not insert a first floor and limit the conversion to what was previously shown as the ‘holiday accommodation’ this would likely be supported, but the usual guidelines to a barn conversion are that the original openings are re-used as far as possible, the alterations to the roof are kept to a minimum, and new doors and windows are timber to be in character with the original materials. Sometimes, extensions are allowed to very small barns to allow for their continued use, such as

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this one in Newport, (web-link)) but extending a single storey barn to two storey is not usually supported.

However, following this advice, the scheme has been re-submitted as currently proposed, and officer views are that this proposal cannot be considered to be either sensitive or sympathetic to the traditional building being converted.

From the eastern elevation, the application looks like a modernised bungalow and from the southern elevation, with its raised balcony, there is nothing to be seen of the traditional character one would expect from a barn in the National Park.

Whilst the northern half of the building is converted relatively simply, the southern end is equivalent to a new dwelling, and does not conserve or enhance the special qualities of the National Park.

Whilst the farm house has been somewhat unsympathetically extended in the past, to the rear, the farmhouse and barns to either side form a typical traditional courtyard setting, the character of which would be irretrievably harmed if the barn is converted to a two storey dwelling. Although there are limited landscape views out of the site, the site is a popular tourist destination, with a guesthouse and campsite, and the development would be clearly visible to all visitors.

As such, the proposal cannot be supported under Policies 8, 14, 29 or 30 of the Pembrokeshire Coast National Park Local Development Plan.

Amenity and Privacy:

Policy 30 of LDP2 refers to 'amenity' in general with criteria (a) and (b) seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties.

The proposal to convert the barn to a full residential dwelling will be directly adjacent to the guesthouse at Bower Farm, and any potential impact on residential amenity will be between these two properties.

The proposed western elevation features a long-glazed section of fenestration under a roof hang which would face onto the parking and frontage of Bower Farmhouse. Given that this is a semi-public space used for parking by the bed and breakfast, this would not be considered to represent an unacceptable impact on residential amenity. The proposed dwelling would have adequate private amenity space to the eastern side of the dwelling.

As such the proposed development is considered to comply with Policy 30 of LDP2.

Access and Parking:

The Highways Department of PCC has been consulted in respect to any potential impact on traffic or highway safety. Their comments read as follows:

'The private access road to Bower Farm is off the Class 3 Road to Little Haven, at about 550 metres down from the Broadway turning off the B4341. The farmhouse is 150 metres down the farm road. The site is no more than 1250 metres from the

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beach on Broad Haven front, using Bridleways and an Unclassified Lanes which are often used by ramblers. The proposed car parking will be an ample improvement for the development’.

As such, the proposed development is considered to comply with Policies 59 & 60 of the LDP.

Biodiversity:

To comply with Planning Policy Wales (2021) and the Environment (Wales) Act 2016 planning authorities are expected to ensure every development positively contributes to biodiversity.

Policies 10 & 11 of the Local Development Plan requires that any development which may disturb, or harm protected species will only be allowed where the effects will be acceptable minimised or mitigated through careful design, work scheduling or other measures.

The PCNPA Ecologist has been consulted with the proposals and had no objection in principle to the proposals and made the following comments:

‘A scoping survey and two activity surveys in August 2020 by Gould Ecology confirmed that the building proposed for works and conversion is not being used as a bat roost.

On the basis of the information provided it is considered that an EPS license is not required in this instance and there is a reasonable likelihood that bats will not be affected by the development, however it is recommended that the following advisory notes and conditions are included in any consent, and that a condition to ensure any external lighting is imposed.

Natural Resources Wales have been consulted and have confirmed they have no objection to the proposals.

Provided that such conditions and advisory notes are imposed on any consent issued, the development would be seen to comply with the requirements of Policies 10 & 11 of the Pembrokeshire Coast National Park Local Development Plan 2.

Drainage:

The Drainage Engineers at Pembrokeshire County Council have been consulted with the development proposals and have raised no objection whilst confirming that the scheme would require SAB consent.

Dwr Cymru have been consulted and suggested that the applicant will need to contact NRW and or/Building Regulations with regard to the proposed foul drainage.

Other Material Considerations: Coal Authority

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

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The Coal Authority records indicate that the application site lies in an area containing coal outcrops, which may have been subject to historic unrecorded coal workings at shallow depth.

The Coal Authority previously objected to this planning application in a letter to the LPA dated 13 April 2021. The objection was raised on the grounds that a Coal Mining Risk Assessment had not been submitted as part of the application.

The Coal Authority received further information from the applicant's agent (dated 11 May 2021) which included a Coal Authority Mining Report.

Whilst a Coal Mining Report makes no assessment of risk and just provides the baseline data pertaining to the coal mining legacy features present, the content of the email does acknowledge the risks posed by potential shallow recorded coal mine workings and proposes an intrusive ground investigation to identify any necessary remedial measures.

Consequently, the Coal Authority has now withdrawn its objection subject to the LPA imposing a suitable planning condition to ensure the undertaking of the proposed investigations and any necessary remedial/mitigatory measures.

Dyfed Archaeology:

Dyfed Archaeology's consultation response is copied in part below.

'The building in question is recorded as part of a post-medieval farmstead which appears on the 1842 Parish tithe map for Walton West (PRN 119704). We do not believe at this time, that the proposed development will have a significant impact upon any buried archaeological resource, however, if during development, material of archaeological interest comes to light, we can subsequently arrange to visit the site and further advise.

We do however recommend that, should consent be given, a photographic record be made prior to any work. This recommendation is based on the information provided and would most appropriately take the form of a condition attached to the application, ensuring that the necessary photography is undertaken. This is in line with Planning Policy Wales and Technical Advice Note 24 – The Historic Environment'.

Conservation Officers Consultation Response:

1. The existing building is a traditional C19 farm range forming a good group with the house. It is typical of many we have allowed for conversion and there seems no objection in principle in the context of the present structure.

1. The proposed extensions and alterations however significantly alter the scale, form and detail of the building. Whereas we have allowed subsidiary extensions to conversions like this, the proposed upper storey and rear wing are clearly not subsidiary. They dominate the building and change the setting of the group. The upper storey gives a generic nod to local form in its gabled form, but otherwise the

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details – the deep eaves, the screen glazing, the balcony, the catslide roof (like a domestic out-shut) and rear wing are domestic in form and not appropriate in this context.

2. In terms of LDP2 policy:-

- Policy 1. The proposal in my view does not conserve the cultural heritage of the National Park given the dominating impact on a simple farm range, one of many forming the 'grain' of the landscape of the National Park. The building seems to be capable of providing accommodation without the need for the upper storey. A more subsidiary extension would seem acceptable to providing extra room.
- Policy 8d. The proposal – in my view – does not protect the historic environment and certainly does not enhance it (in the context of the special qualities as opposed to intrinsic design, on which I reserve comment)
- Policy 14d. Whilst the proposal retains some legibility of the structure, the overall level of extension in my view fails to meet the test of this policy criterion, which has a wider context in terms of conservation and enhancement - where buildings like this are themselves features within the landscape
- Policy 29a. I am not sure how the proposal pays regard to place and local distinctiveness. This is not to say that modern design has no place in the National Park – it clearly does, but there is a context. Whilst views vary on the broad topic of design, design guidance generally advocates that the new extension work is both legible and subsidiary. The proposed rear elevation bears no resemblance whatsoever to the historic building - a visitor might well regard the building as a new dwelling - which is a simple but telling test in terms of local and national policy objectives. The proposed front elevation bears some resemblance to the historic building, which arguably also fails the test.

3. In terms of TAN 12, para 5.6.2. stresses the importance of assessing and understanding character in protected area like National Parks. TAN12 sets out character objectives in sustaining and enhancing local character. Issues such as setting, grouping, locally distinctive building elements and materials are all factors advocated for consideration. Whilst TAN 12 has a broader context and applies across all parts of Wales, the character objectives are fundamental when considering proposals within the N.P

My recommendation therefore is refusal.

Conclusion

The requirements set out in Policy 29 for the National Park are that proposals be well designed in terms of place and local distinctiveness.

The proposed design is considered to be unsympathetic to the traditional building being converted and as such cannot be supported under national or local planning policies.

Recommendation

REFUSE, for the following reason(s):

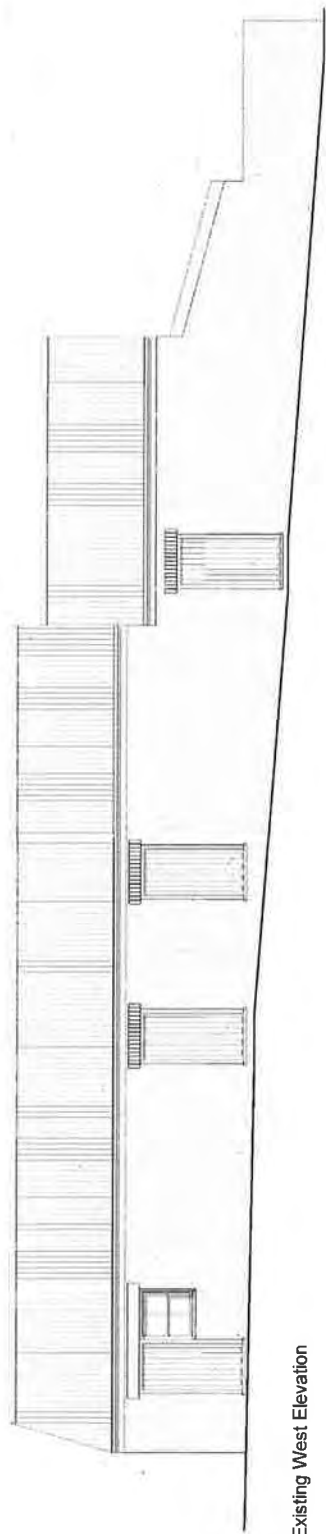
Pembrokeshire Coast National Park Authority
Development Management Committee – 21st July 2021

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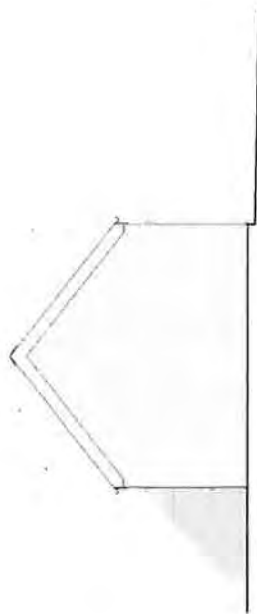
1. The proposed conversion and extension of the existing building is not considered to represent a sympathetic conversion of a traditional building, and to be both overdevelopment of the existing building and to represent a poor quality of design. It is therefore contrary to Policies 1, 7, 8, 14 & 29 of the Pembrokeshire Coast National Park Local Development Plan.



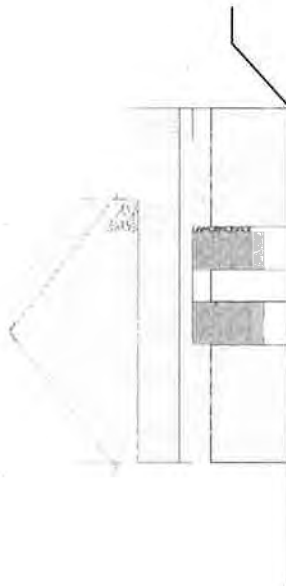
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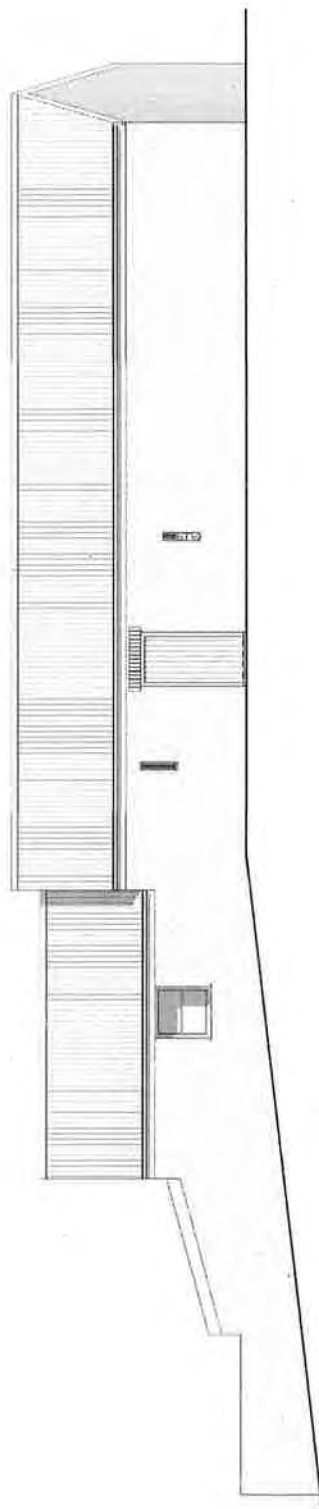
Existing West Elevation



Existing North Elevation



Existing South Elevation



Existing East Elevation

1	Project	Carriads Cottage
2	Phase	Existing Elevations
3	Author	Michael Boel
4	Date	26/03/2020
5	Scale	1:100
6	Sheet	A111

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Client: Ruth Birt-Llewellyn
 Bower Farm, Broad Haven, SA62 3TY

Project: Carriads Cottage
 Title: Existing Elevations

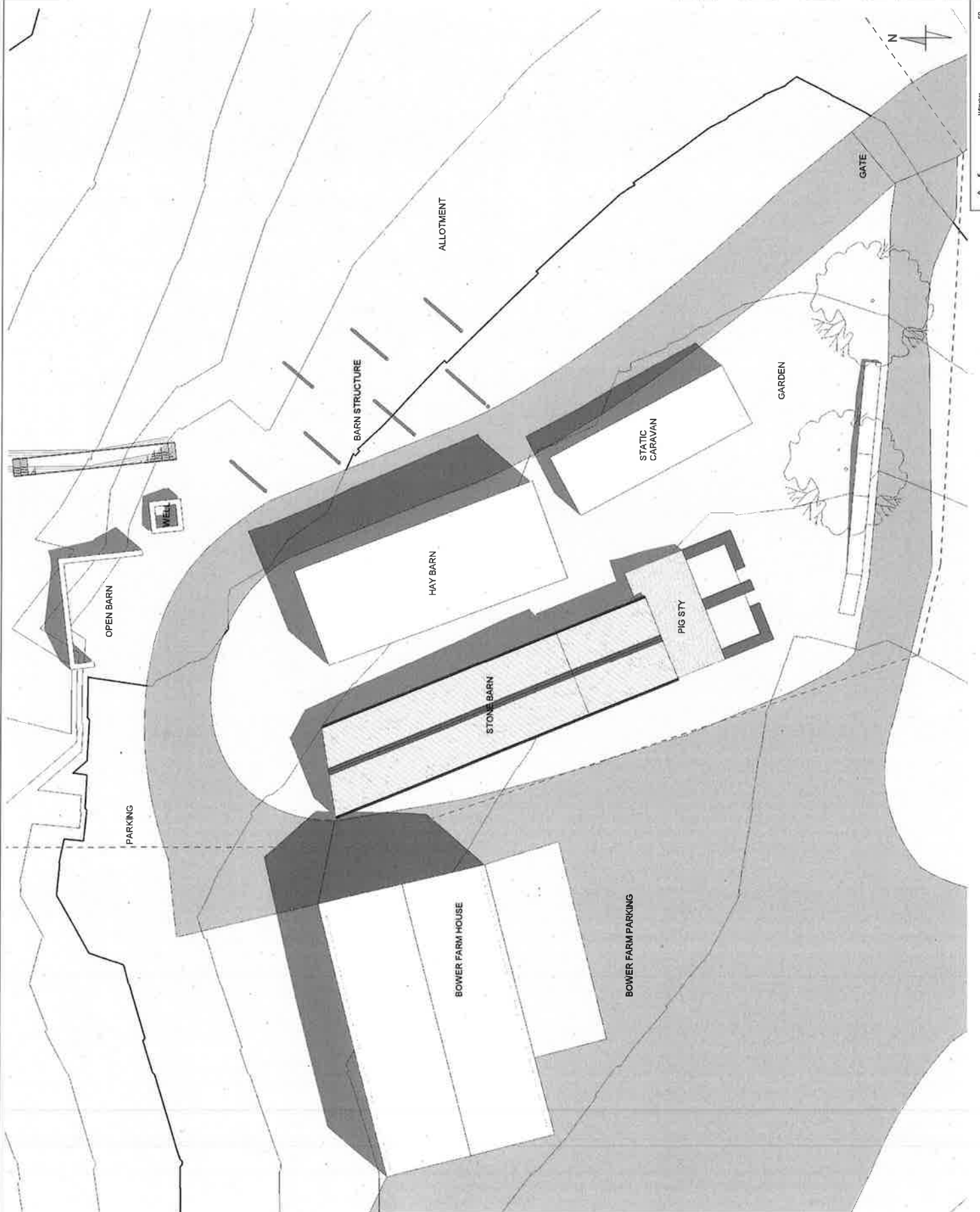
Drawn: Michael Boel
 Date: 26/03/2020
 Drawing Number: A111



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No.	Revised	By	Date	Author
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2				
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4				
5				

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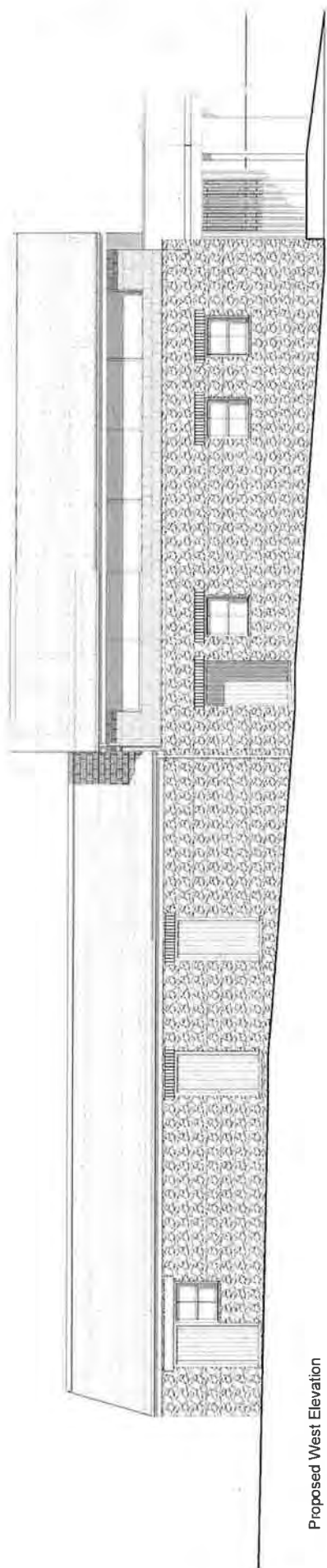
Project: Carriads Cottage
 Title: Existing Site Plan

Original Scale	Drawn	Check	Date	Rev
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Drawing Number: A101

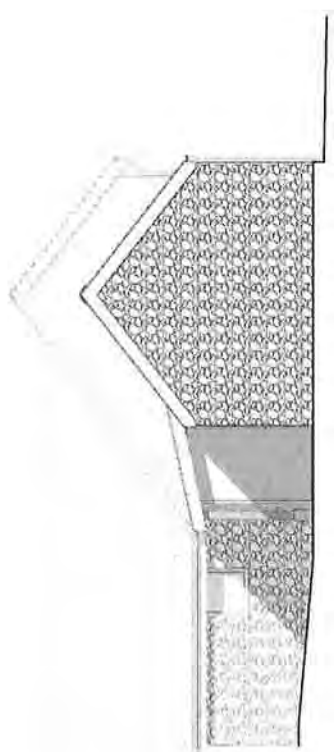


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Proposed West Elevation

Materials:
 Walls - Field stone walls and hung natural slate.
 Roof - Natural slate with profile metal cast slide
 Windows/Doors to eaves - Painted Timber/dark grey
 Windows/Doors to new element - PC Aluminium (Dark grey)
 Fences - Painted timber
 Rainwater goods - Black Cast iron effect



Proposed North Elevation

No.	Rev.	Proposed	Author	Date
1	1	18/02/2021		
2	1	18/02/2021		
3	1	26/03/2020		



Client: Ruth Brit-Llewellyn
 Bower Farm, Broad Haven, SA62 3TY.

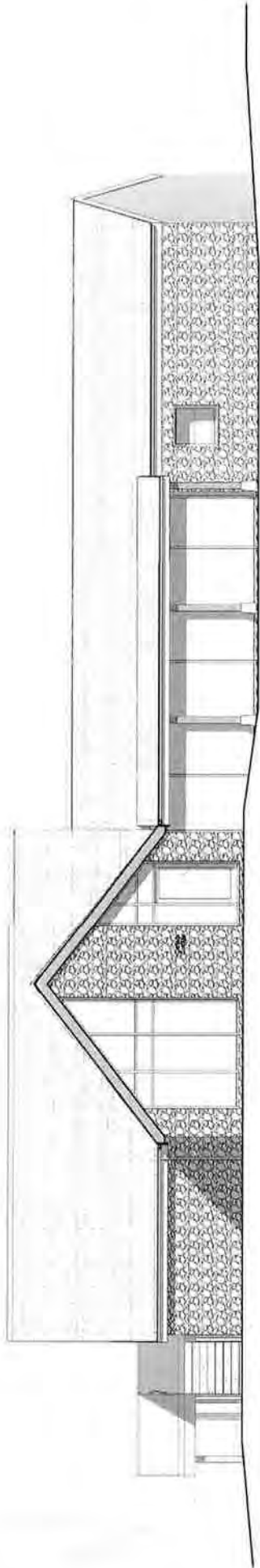
Project: Cariads Cottage

Title: Proposed Elevations

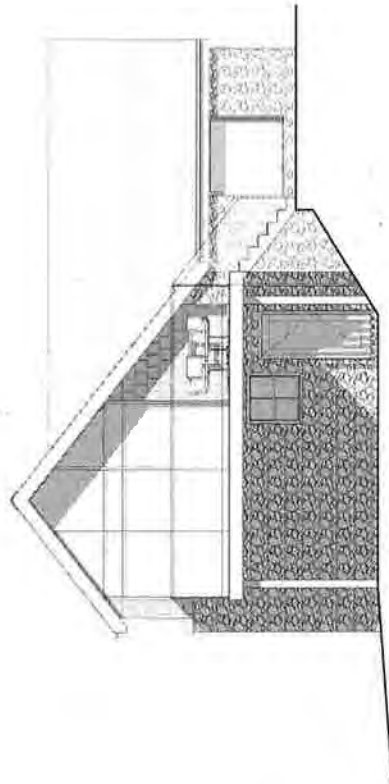
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1 : 100	Michael Boel	Michael Boel	C
Drawing Number	A122		



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Proposed East Elevation



Proposed South Elevation

Rev.	Proposed	Approved	Date
C	18/03/2021		
B	18/03/2021		
A	18/03/2021		

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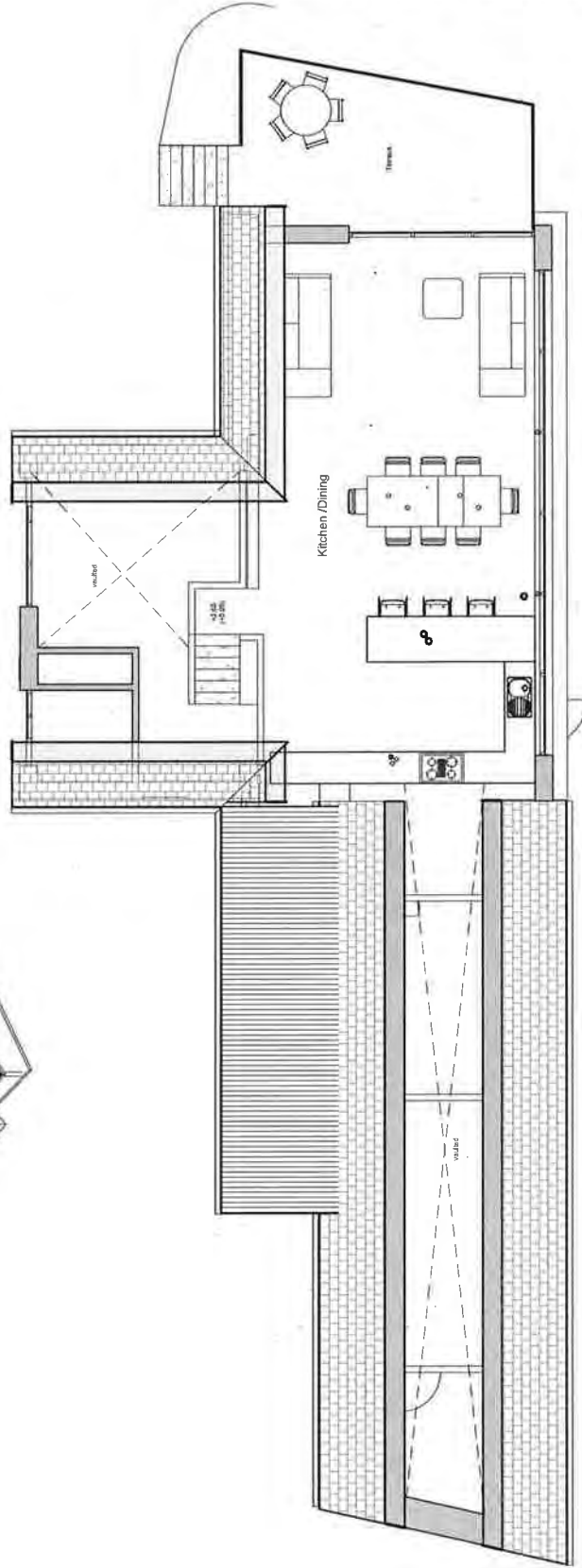
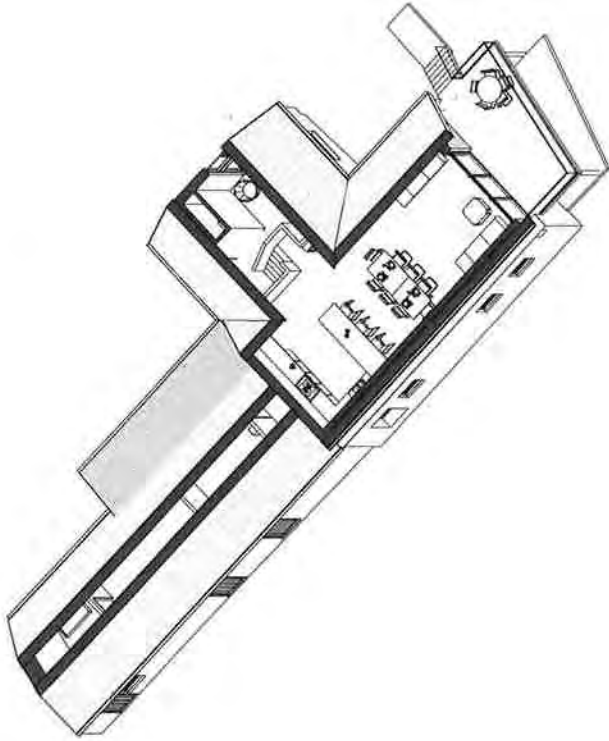
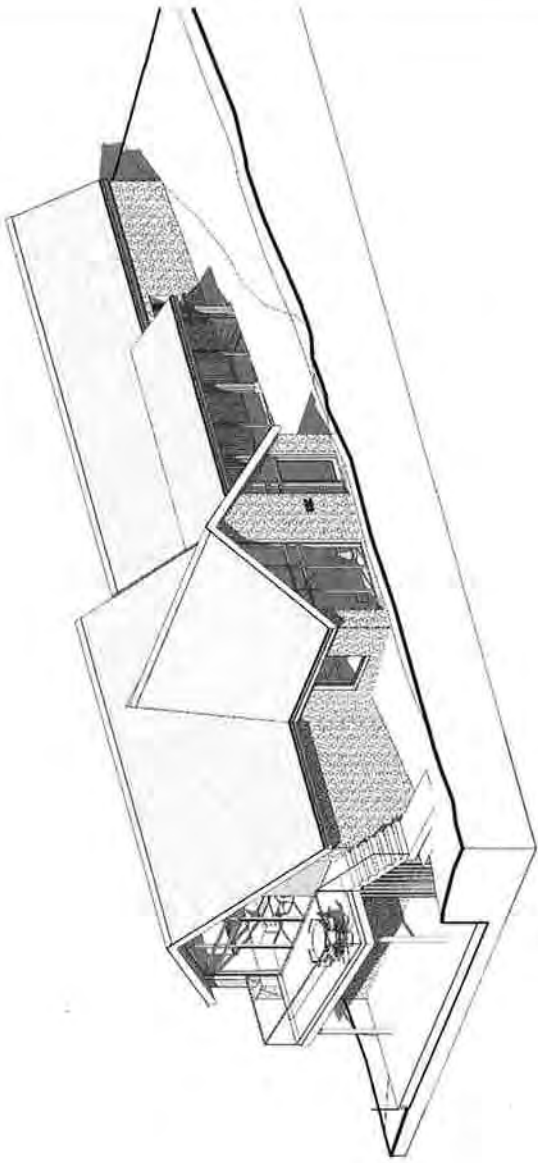
Project: Carriads Cottage
 Title: Proposed Elevations

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18/03/2021			

Drawing Number: A123



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Proposed First Floor Plan

1	Planning	13/03/2021
2	Planning	12/10/2020
3	Planning	11/09/2020
4	Planning	12/06/2020
5	Planning	12/06/2020
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Project: Canads Cottage

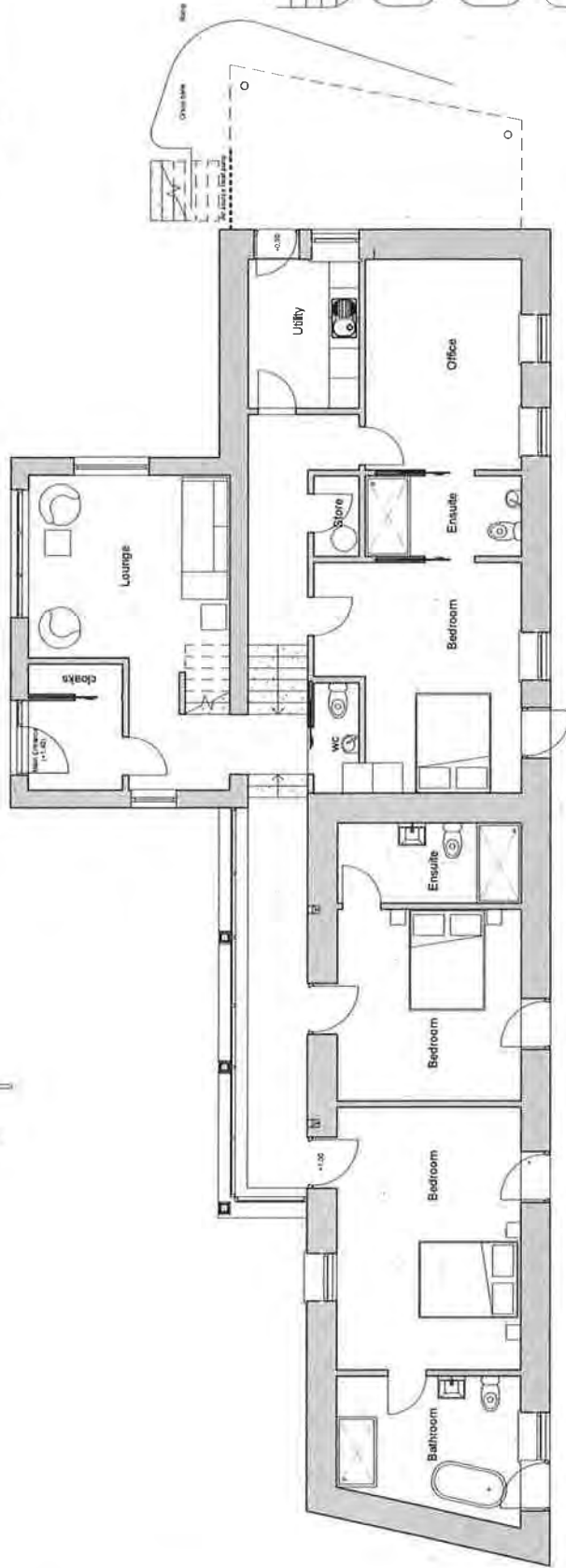
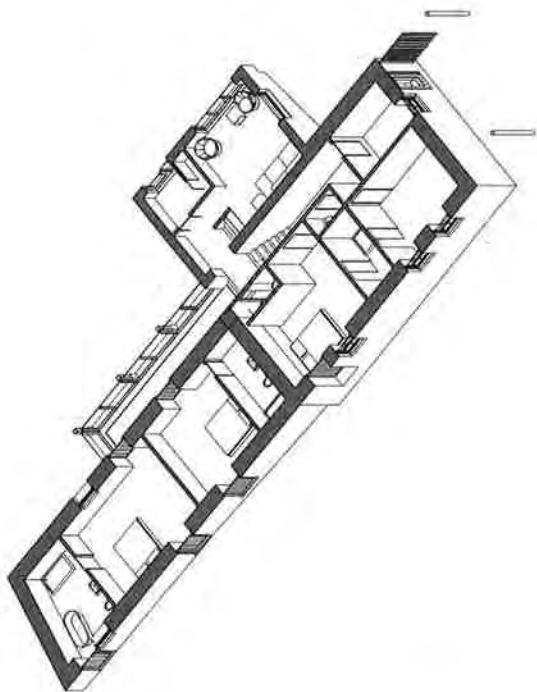
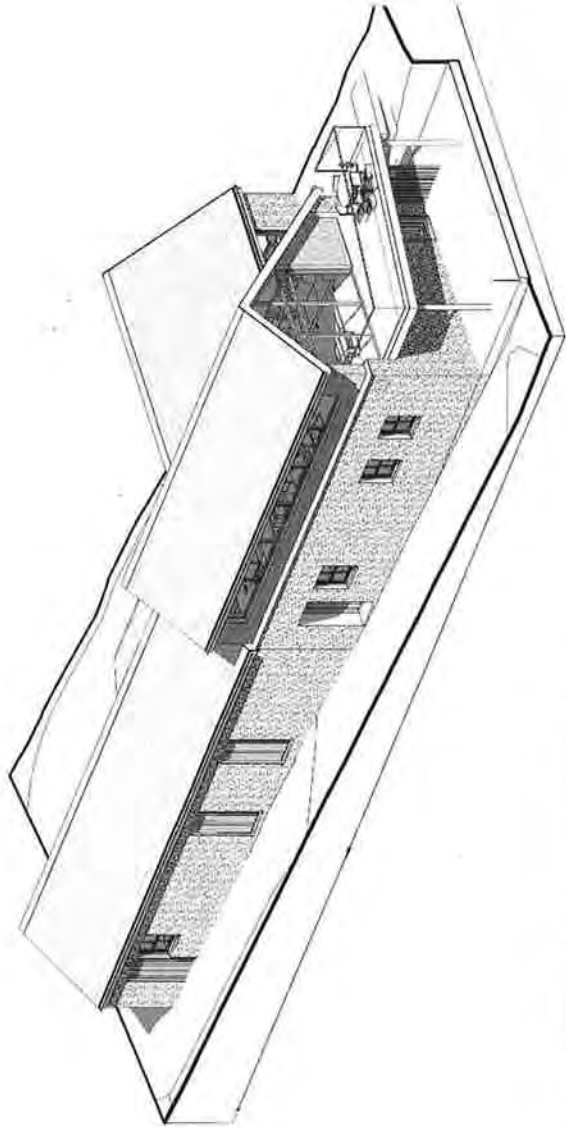
Title: Proposed First Floor Plan

Original Scale	1 : 100
Drawn	Michael Bell
Date	05/03/2020
Drawn Number	A113



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1	Revised	ML	15/06/2021	15/06/2021
2	Revised	ML	15/06/2022	15/06/2022
3	Revised	ML	15/06/2023	15/06/2023
4	Proposed	ML	05/06/2025	05/06/2025

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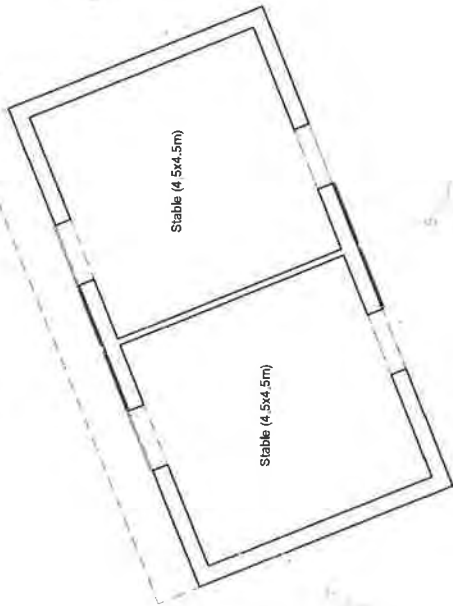
Project: Carlad's Cottage

Title: Proposed Ground floor plan

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Client: 05/06/2025	Date: 05/06/2025	Drawing number: A112

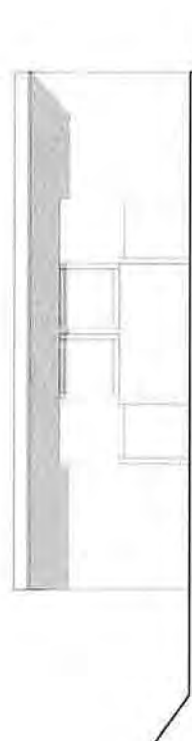
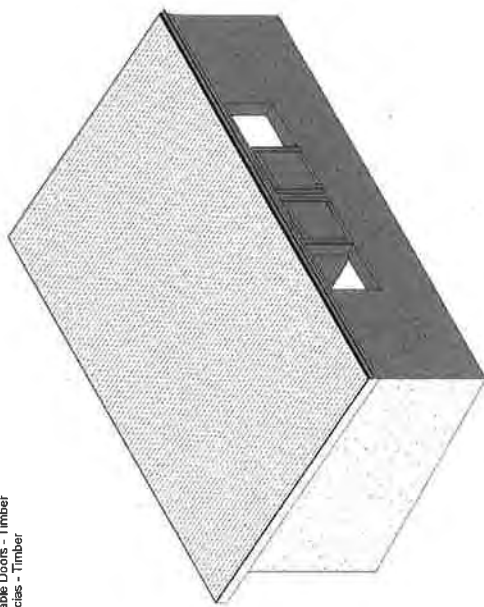
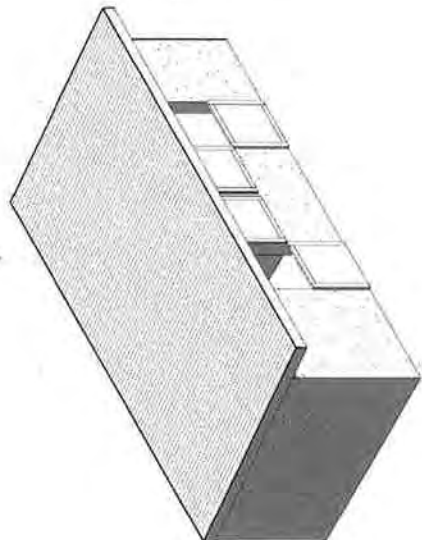
Proposed Ground Floor Plan

A140



Proposed Stable Plan

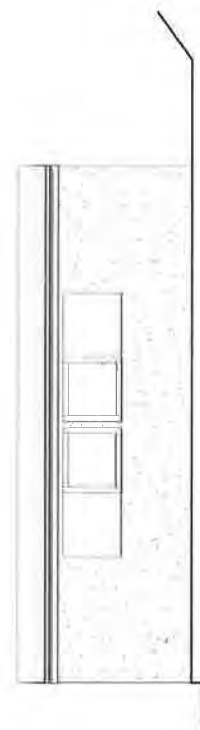
Materials:
 Rendered walls - White
 Profile metal roof - Dark grey
 Stable Doors - Timber
 Facias - Timber



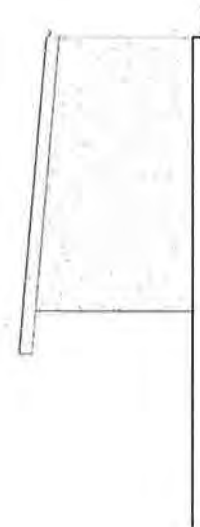
4 - Proposed Stable Front Elevation



6 - Proposed Stable Side Elevation



5 - Proposed Stable Rear Elevation



7 - Proposed Stable Side Elevation

Notes:
 - Drawings to be read in conjunction with specification
 - All dimensions are in millimetres unless stated
 - Do not scale unless printed at 100%
 The drawings are subject to the terms and conditions of the contract and the client. It is advised for the client to contact the architect and the client to discuss the terms and conditions of the contract and the client.

No.	Planning	1/20/2022	Date
A	Draw	15/06/2022	Date



Client
 Ruth Birt-Llewellyn
 Bower Farm, Broad Haven, SA62
 3TY.

Project
 Canads Cottage

Title
 Stable - Plans & Elevations

Original Scale	Drawn	Author	Rev
1 : 100		06/15/20	B

Drawing Number
 A140

