

Application Ref: NP/21/0651/FUL

Case Officer Kate Attrill
Applicant Mr & Mrs T & G Griffiths
Agent Mr Llyr Evans, Llyr Evans Planning Ltd
Proposal Full application for demolition and replacement of dwelling, extension of residential curtilage and associated works.
Site Location Penyrallt, Mynachlogddu, Clynderwen, Pembrokeshire, SA66 7RU
Grid Ref SN14592957
Date Valid 15-Oct-2021 **Target Date** 09-Dec-2021

This application has been brought to the Development Management Committee at the request of the Chair of Committee for the following reasons: to allow the property to be enhanced for modern day living and to enable a young local couple to return and reside in their home village.

Consultee Response

PCNPA Buildings Conservation Officer: Objecting
PCC - Transportation & Environment: No objection
Dyfed Archaeological Trust: Conditional Consent
PCC - Drainage Engineers: Conditional Consent
Natural Resources Wales: Standard Advice
Dwr Cymru Welsh Water: Observations

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.

One third party letter of representation was received on the previous application, citing concerns over the potential for external lighting, and asking it to be carefully controlled in order to protect against light pollution in this isolated location.

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

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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 59 - Sustainable Transport
LDP2 Policy 60 - Impacts of Traffic
PPW11
TAN 05 - Nature Conservation and Planning
TAN 12 - Design
TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m
Biodiversity Issue
Historic Landscape
Safeguarding Zone
Hazardous Zones
Recreation Character Areas
Affordable Housing Submarkets
Landscape Character Area

Officer's Appraisal

Site and Context

The site lies within the Mynydd Preseli Registered Landscape of Outstanding Historic Interest in Wales (LCA 27). The description reads: a large and very conspicuous inland upland area of heath and moorland, visible from a great distance. The views to the coast and the feeling of exposure provide a strong sense of place.

The dwelling and the agricultural buildings to the opposite side of the road are currently in the same family ownership, but the red line to this application only includes the dwelling on the eastern side of the road.

The next dwellings to the north are Bryncleddau and Brynhyfryd, which date to the early 20th century, whilst to the south lies a bungalow which has either been re-developed over an earlier dwelling (Pen-cwarre) or incorporates the earlier dwelling under unsympathetic alterations. To its immediate south is Bryn-Arthur, which was also present on the 1889 OS maps and also features the characteristic cat-slide roof, typical of this area.

Relevant Planning History

PA/20/0040 Pre-application advice requested on acceptability of demolition and rebuild of existing dwelling – not supported by officers.

The previous application, which proposed the same design as that currently under consideration was refused under NP/21/0263/FUL on the 23rd of August 2021 under the extended delegation procedure.

Description of Proposal

This application involves the demolition of an existing two storey dwelling and associated single storey garage and construction of a replacement 2 storey dwelling.

Penyrallt consists of a small complex of buildings which includes a two storey dwelling with cat-slide roof attached garage and store, with a Dutch barn to the eastern side of the road and a collection of traditional outbuildings on the opposite side of the road.

The application also proposes an extension of residential curtilage by 'squaring off' a section of land to the south east of the dwellings existing garden and including the dutch barn to the rear as a domestic outbuilding.

The existing dwelling has two bedrooms at first floor level, with a kitchen, bathroom living room and dining room at ground floor level with attached garage at the northern end.

The proposed replacement dwelling features four bedrooms at lower floor level with and kitchen, dining and living rooms at first floor level, labelled as 'upper entrance level'.

The only alteration to the scheme previously refused is the addition of an area to the south to provide for a drainage scheme.

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
- Access and Parking
- Landscaping
- Biodiversity
- Drainage
- Other Material Considerations

Policy:

Planning Policy Wales, at paragraph 6.3.6 states: In National Parks, planning authorities should give great weight to the statutory purposes of National Parks,

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which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities.

The site lies within the open countryside as defined by the Pembrokeshire Coast National Park adopted Local Development Plan (LDP) and Policy 7 is the relevant strategic policy which allows for release of land depending:
on the character of the surroundings, and the pattern of development in the area'.

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.

As the site is a typically vernacular traditional building within a designated Historic Landscape, the Built Conservation Officer for the Authority has been consulted. His comments are as follows:

1. The existing building is a traditional C19 range comprising farmhouse and single storey range in-line, presumably once a cowshed. It is typical of many examples which form the 'grain' of the landscape especially across the northern part of the county. Whilst not listed and despite some modernisation, the property has retained its form well and appears to have scope for sensitive extension and upgrading.

2. I have no comment to make on the designs of the proposed replacement dwelling. My comments solely concern the principle of replacement, to which I would object. The vast majority of buildings across the NP are not protected by listing or conservation area status, yet they form the backbone of our built heritage. Given the protected status of our landscape – of which our buildings are a critical part – the principle of replacement is only acceptable when a property is deemed beyond repair or has been wholly altered so as to lose its character and form. Neither is the case here – and the reasons put forward for demolition do not at all justify demolition. Most of Wales'

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housing stock is stone built, all units of embodied energy and most capable of thermal upgrading and extension to provide comfortable homes.

3. In terms of LDP2 policy: -

- Policy 1. The proposal in my view does not conserve the cultural heritage of the National Park given the loss of a building group that forms part of the 'grain' of the landscape of the National Park. There seems to be good scope for extending and upgrading the property, be it in traditional or modernist mode.
- 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. All legibility of the group has been lost. Historic farmsteads like this are themselves features within the landscape
- Policy 29a. How sustainable is the demolition of a dwelling capable of upgrading and adapting? How does the proposed replacement dwelling address 'place and local distinctiveness'?

4. 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 a N.P

I therefore object to the principle of demolishing the existing dwelling.

The scale, bulk and form of the proposed dwelling are not considered to respect the local architectural distinctiveness as required by Policy 29, nor the context of the farm buildings on the other side of the road which currently are visually cohesive in style and form. The bulk, scale and design are reminiscent of the style of municipal 1960's dwellings rather than any form of local distinctiveness or good quality contemporary design which could respect local building scale and form.

At pre-application stage, the justification for the demolition and replacement was given as damp, but no structural survey has been submitted to establish that the house could not be reasonably repaired or refurbished.

Whilst there is no LDP or Welsh Government policy to require an assessment of embodied carbon, the replacement of a traditional vernacular building cannot be seen as sustainable without significant justification, but in the absence of any policy specifying this, this could not reasonably be used as a reason for refusal.

However, the replacement of a dwelling which has a traditional scale and character and which sits gently within the landscape of the National Park and its replacement of one with little or no architectural merit or traditional features cannot be supported as it will lead to a loss of visual and historic character, contrary to Policies 8, 14 and 29 of the Pembrokeshire Coast National Park Local Development Plan.

Access and Parking:

The Highways Authority have been consulted in respect to any potential impact on traffic or highway safety. Their consultation response is copied below.

'The existing access will be retained and only narrowed a bit. The concrete surfacing will be much longer, leading to an area by the main dwelling door, and it will still be wide enough along its length for three-point turns. A pull in bay will be retained on the frontage. The dwelling will still be a fairly modest four-bedroom accommodation. There is no requirement for altering the frontage walling, even to take away the milk stand or the pillars of the old pedestrian gate, as it is understood that keeping these will have merit'.

The proposed development is therefore considered to comply with Policies 59 & 60 of the Pembrokeshire Coast National Park Local Development Plan.

Landscaping & Biodiversity

The Authority's Tree and Landscape Officer has been consulted with regards to the proposals, and a condition to ensure works during construction has been suggested.

The submitted Bat and Bird Survey was carried out in September 2019 and can be considered to be an up-to-date survey. This has identified that a license will be required from NRW for the works proposed, as Penyrallt is host to non-breeding long-eared bats and pipistrelles.

Drainage:

The Drainage Engineers at Pembrokeshire County Council have been consulted with the development proposals and have raised no objection.

Pembrokeshire County Council as SuDS Approving Body (SAB)) have stated that by virtue of the fact that the construction area having drainage implications appears to be in excess of 100 square metres, the proposed works will require SAB approval prior to the commencement of any works.

Welsh Water commented on the previous application that the proposed development is crossed by a trunk/distribution watermain, and that development cannot take place within a 3-metre buffer zone of the main.

Other Material Considerations: Dyfed Archaeology:

Dyfed Archaeology have checked this proposal against the Regional Historic Environment Record, which currently stands at over 60,000 sites of archaeological and historical interest. These records have been formally adopted by resolution of your Authority for the purposes of the Town & Country Planning (General Permitted Development) Order 1995.

This search has revealed that the building in question is recorded on the 1889 First Edition Ordnance Survey Map for Cardiganshire. They do not believe at this time,

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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, they can subsequently arrange to visit the site and further advise.

They 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. The following wording for a condition would be suitable: ‘

Development shall not begin until an appropriate photographic survey of the existing building(s) has been carried out in accordance with guidelines provided by the Local Planning Authority's archaeological advisors - Dyfed Archaeological Trust- Heritage Management. The resulting photographs should be approved by the planning authority prior to the commencement of development and deposited with the regional Historic Environment Record’.

Conclusion

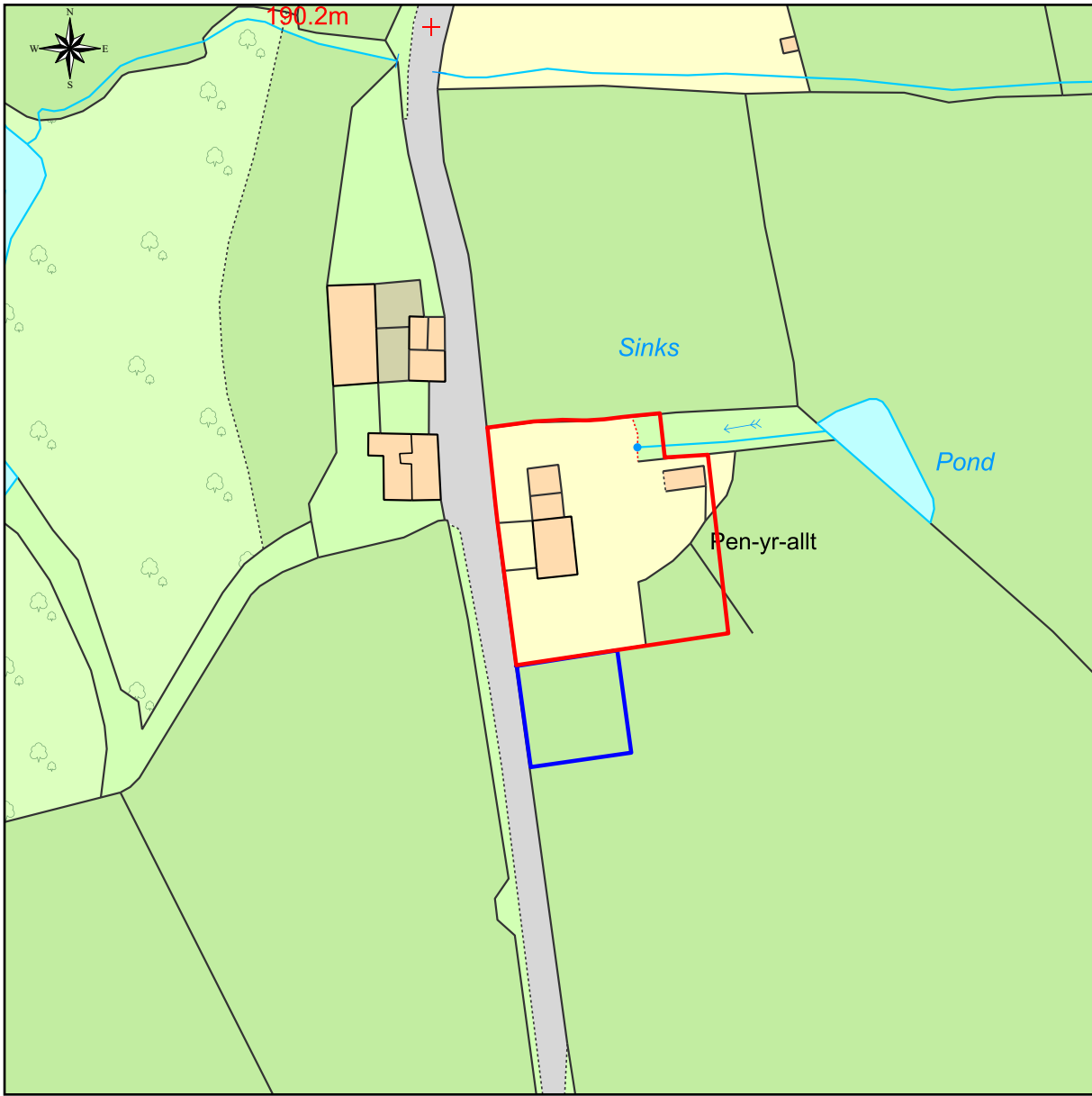
The proposed dwelling does not enhance or conserve the cultural/built heritage of the National Park and does not incorporate traditional features or design. The scale, bulk and form are considered to be out of character with its surroundings, and the loss of the form of the historic farmstead is considered to be to the detriment of the character and special qualities of the National Park.

Recommendation

REFUSE, for the following reason(s):

1. The proposed replacement dwelling does not conserve or enhance the landscape of the National Park, and is thus contrary to Policies 1, 8, 14 and 29 of the Pembrokeshire Coast National Park Local Development Plan, the spirit of TAN12, and the guidance in Planning Policy Wales.

Penrallt



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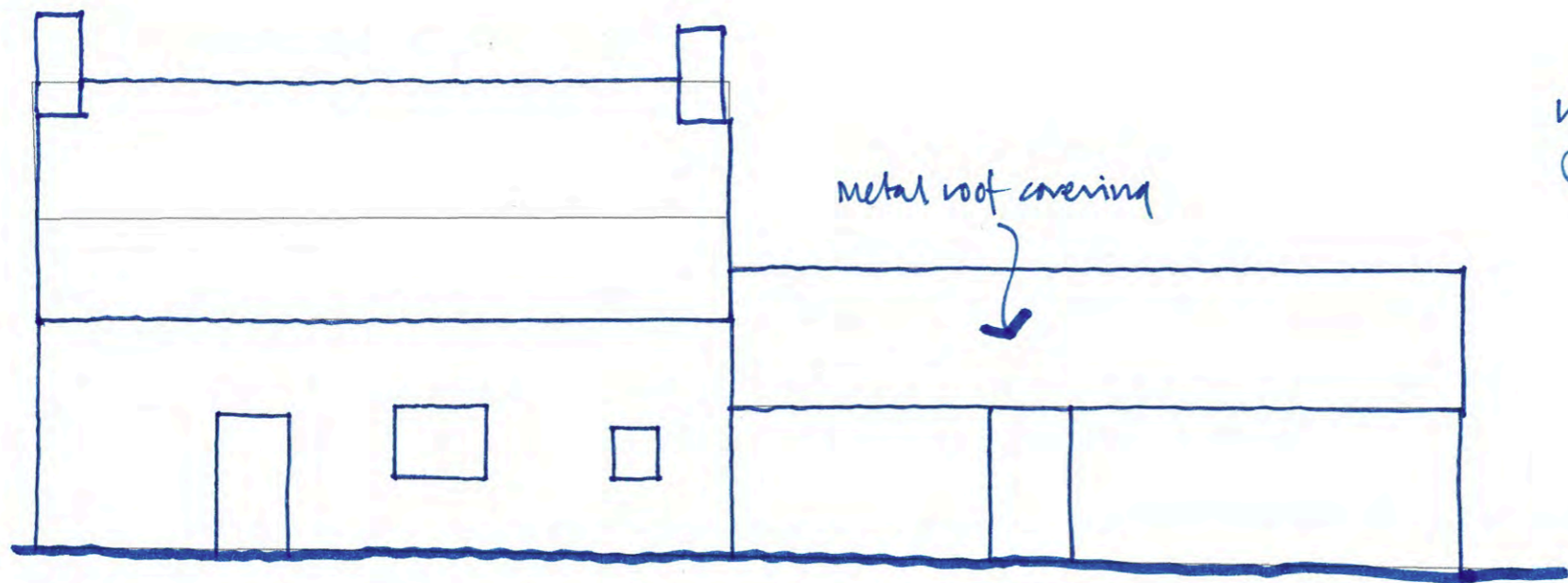
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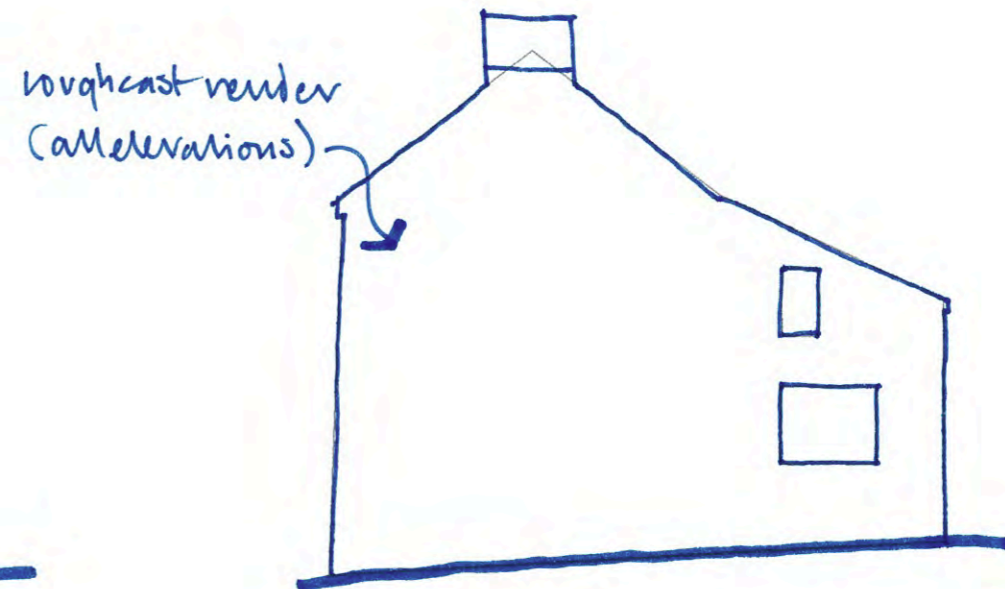
Site Location Plan

19/64/00

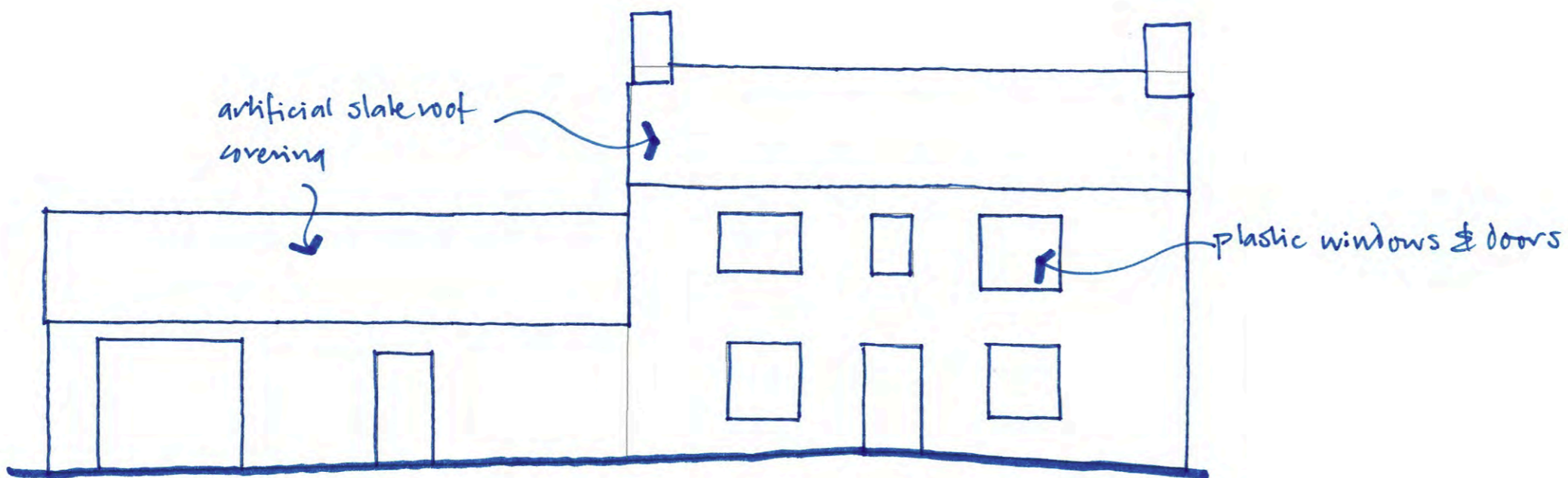




* REAR Elevation as Existing



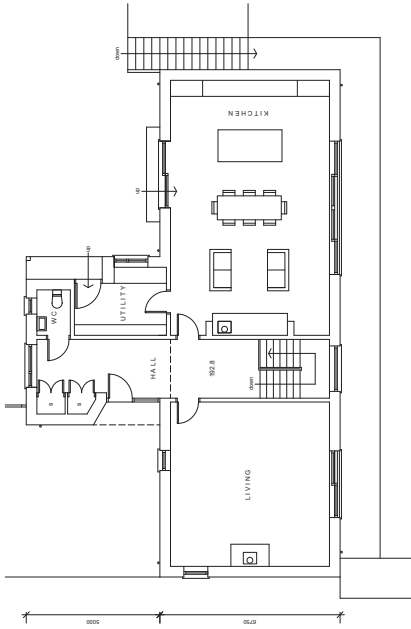
* SIDE Elevation as Existing



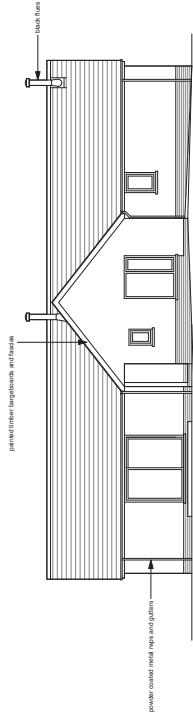
* FRONT Elevation as Existing



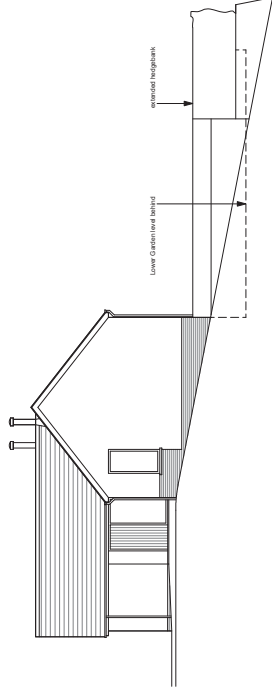
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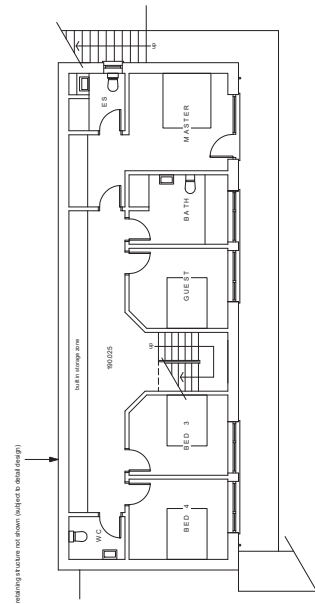
Upper (Entrance) Floor Plan



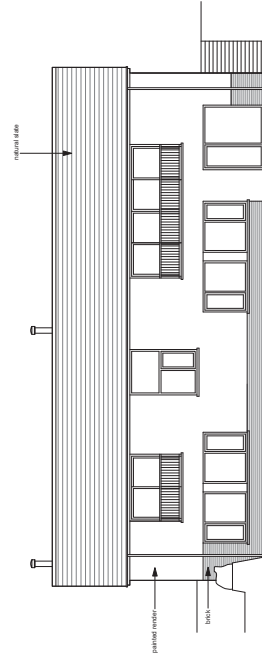
East Elevation



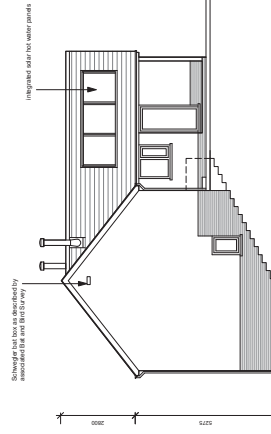
North Elevation



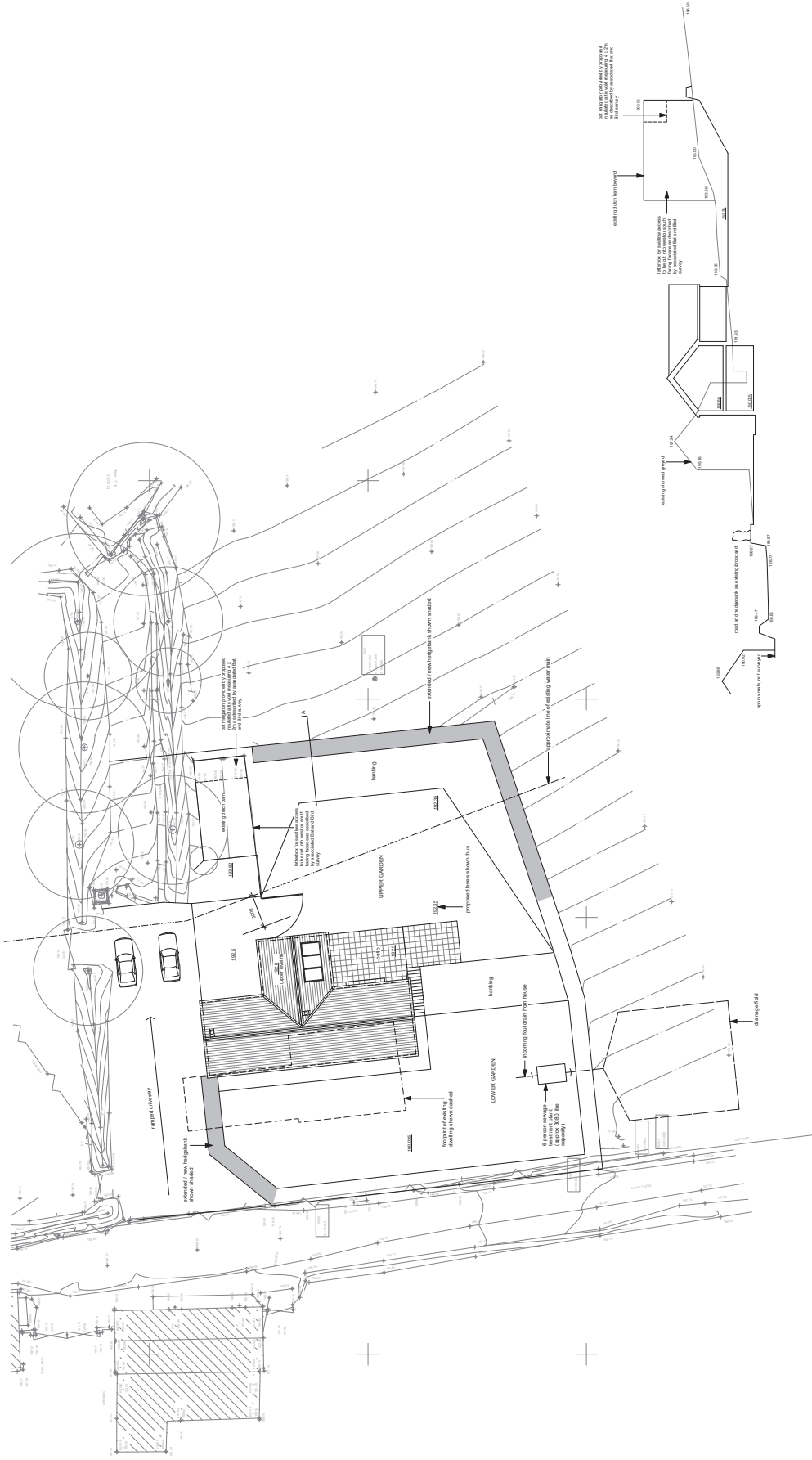
Lower Floor Plan



West Elevation



South Elevation



Site Plan as Proposed

Site Section A as Proposed